

## EXHIBIT A

**SERVE**  
2019CVA002071D3

**CITATION**

ORIGINAL PETITION AND REQUEST FOR DISCLOSURE

**THE STATE OF TEXAS  
COUNTY OF WEBB**

**CALENDAR CALL COURT DATE:  
01/8/2020 AT 1:30 PM**

**NOTICE TO THE DEFENDANT:** "YOU HAVE BEEN SUED. YOU MAY EMPLOY AN ATTORNEY. IF YOU OR YOUR ATTORNEY DO NOT FILE A WRITTEN ANSWER WITH THE CLERK WHO ISSUED THIS CITATION BY 10:00 A.M. ON THE MONDAY NEXT FOLLOWING THE EXPIRATION OF TWENTY DAYS AFTER YOU WERE SERVED THIS CITATION AND PETITION, A DEFAULT JUDGMENT MAY BE TAKEN AGAINST YOU."

**TO: BUCHHEIT TRUCKING SERVICE INC.  
BY SERVING RON GJERSTAD  
600 DAUGHERTY  
SCOTT CITY MO 63780 OR WHEREVER IT MAY BE FOUND**

DEFENDANT, IN THE HEREINAFTER STYLED AND NUMBERED CAUSE, YOU ARE HEREBY COMMANDED TO APPEAR BEFORE THE 341st District Court of Webb County, Texas, to be held at the said courthouse of said county in the city of Laredo, Webb County, Texas, by filing a written answer to the Petition of Plaintiff at or before 10:00 O'CLOCK A.M. of the Monday next after the expiration of 20 days after the date of service thereof, a copy of which accompanies this citation, in the Cause #: 2019CVA002071D3, styled:

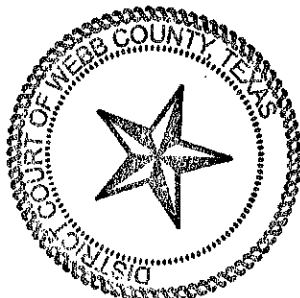
**ROSARIO CAMARILLO-CABELLO, INDIVIDUALLY AND AS NEXT FRIEND OF  
MIGUEL ANGEL CABELLO, A MINOR, PLAINTIFFS  
VS.**

**BUCHHEIT TRUCKING SERVICE INC.; MICHAEL SCOTT FRENCH;  
ESTATE OF JESUS TAPIA JR, DEFENDANTS**

Said Plaintiff's Petition was filed on 10/17/2019 in said court by:  
**URIEL DRUKER, ATTORNEY FOR PLAINTIFF  
1119 HOUSTON ST  
LAREDO TX 78040**

**WITNESS ESTHER DEGOLLADO, DISTRICT CLERK OF WEBB COUNTY, TEXAS,**  
Issued and given under my hand and seal of said court at office,  
on this the 21st day of October, 2019.

**C L E R K O F C O U R T**



ESTHER DEGOLLADO  
WEBB COUNTY DISTRICT CLERK  
P.O. BOX 667  
LAREDO, TX 78042

BY:

  
Diana Vela

DEPUTY

2019CVA002071D3

## OFFICER'S RETURN

Came to hand on the \_\_\_\_\_ day of \_\_\_\_\_, 2019 at  
 \_\_\_\_\_ O'CLOCK \_\_\_\_\_ .M. Executed at  
 \_\_\_\_\_, within the COUNTY of \_\_\_\_\_  
 at \_\_\_\_\_ O'CLOCK \_\_\_\_\_ .M. on the \_\_\_\_\_ day of  
 \_\_\_\_\_, 2019, by delivering to the within named  
**BUCHHEIT TRUCKING SERVICE INC.**, each, in person, a true copy of  
 this citation together with the accompanying copy of the  
 petition, having first attached such copy of such petition to  
 such copy of citation and endorsed on such copy of citation the  
 date of delivery.

The distance actually travelled by me in serving such process  
 was \_\_\_\_\_ miles, and my fees are as follows:

Total Fee for serving this citation \$ \_\_\_\_\_.

To certify which, witness my hand officially.

\_\_\_\_\_  
 SHERIFF, CONSTABLE

\_\_\_\_\_  
 COUNTY, TEXAS

BY \_\_\_\_\_  
 DEPUTY

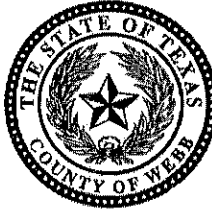
THE STATE OF TEXAS }  
 COUNTY OF WEBB }

Before me, the undersigned authority, on this day personally  
 appeared \_\_\_\_\_, who after being duly  
 sworn, upon oath said that a notice, of which the above is a  
 true copy, was by him/her delivered to

\_\_\_\_\_ on the  
 \_\_\_\_\_ day of \_\_\_\_\_.

SWORN TO AND SUBSCRIBED BEFORE ME on the \_\_\_\_\_ day of  
 \_\_\_\_\_, \_\_\_\_\_, to certify which witness my hand and  
 seal of office.

\_\_\_\_\_  
 NOTARY PUBLIC  
 MY COMMISSION EXPIRES  
 \_\_\_\_\_



**HONORABLE BECKIE PALOMO**

**State District Court Judge**

341<sup>st</sup> JUDICIAL DISTRICT OF TEXAS

WEBB COUNTY JUSTICE CENTER

1110 Victoria Street, Suite 302

Laredo, Texas 78040-4439

**CIVIL CASE – CALENDAR CALL SETTINGS**

RE: CAUSE NO: 2019CVA002071D3

STYLE: ROSARIO CAMARILLO-CABELLO, INDIVIDUALLY AND AS NEXT FRIEND  
OF HER MINOR SON, MIGUEL ANGEL CABELLO

VS

BUCHHEIT TRUCKING SERVICE INC.; MICHAEL SCOTT FRENCH AND THE ESTATE OF JESUS TAPIA JR.

**NOTICE** that this case is **SET FOR CALENDAR CALL** on 01/08/2020 at 1:30 PM at the  
341<sup>st</sup> District Courtroom, 3<sup>rd</sup> Floor, Webb County Justice Center.

Calendar Call hearings will be in open Court and on the record before **JUDGE BECKIE PALOMO**.  
Your presence is **MANDATORY** unless Counsel for Plaintiff(s) file a Joint Pre-Trial Guideline Order  
(PTGO) with all counsels signatures on the PTGO.

You may download the PTGO at our website:

[http://www.webbcountytx.gov/DC341st/Links/civ\\_Jury%20PTGO.pdf](http://www.webbcountytx.gov/DC341st/Links/civ_Jury%20PTGO.pdf)

Counsel for Plaintiff(s): if you do not appear for calendar call, your case may be dismissed for lack of prosecution.

Counsel for Defendant(s): if you do not appear for calendar call, a pre-trial guideline order may be  
entered with or without your approval and/or signature.

Call the court for jury selection dates and pre-trial hearing dates. Keep in mind jury selection must be set  
within the timeframes recommended by the Texas Supreme Court.

If there are any questions regarding this matter please feel free to call the court at the number below.

  
Marti G. Prew  
Civil Court Coordinator  
Tel: (956) 523-4483  
Fax: (956) 523-5055





### III.

#### PARTIES

3. Plaintiffs Rosario Camarillo-Cabello and her minor son, Miguel Angel Cabello, are individuals residing in Laredo, Webb County, Texas.

4. Defendant Buchheit Trucking Service, Inc. ("Defendant Buchheit") is a Missouri corporation that may be served with process by serving its corporate officer, Ron Gjerstad, at its principal office located at 600 Daugherty, Scott City, Missouri 63780 or wherever it may be found.

5. Defendant Michael Scott French ("Defendant French") is an individual that may be served with process by serving him at his residence located at 2810 Whitmer A, Cape Girardeau, Missouri 63701 or wherever he may be found.

6. Defendant Estate of Jesus Tapia, Jr. ("Defendant Estate") is an entity established and existing in Webb County under the laws of the State of Texas. It may be served with process by serving its designated administrator, Jesus Tapia III, at his residence located at 7511 Patricia Highsmith, Laredo, Texas 78041.

### IV.

#### VENUE AND JURISDICTION

7. Venue for this action is proper in Webb County, Texas, pursuant to Texas Civil Practice and Remedies Code §15.002 because the incident in question occurred there. Jurisdiction is proper in this Court because the amount in controversy is greatly in excess of the minimum jurisdictional limits of this Court.

**V.**

**FACTS OF THE CASE**

8. On September 11, 2019, Plaintiff Rosario Camarillo-Cabello was operating a 2016 Volkswagen Touareg and traveling northbound on the 5000 block of Bob Bullock Loop (“Loop”) with her minor son, Plaintiff Miguel Angel Cabello, in the front passenger seat. Defendant French was operating a 2006 Freightliner hauling an attached trailer (“tractor-trailer”) in his capacity as an employee of Defendant Buchheit and traveling southbound on the Loop when he drove onto the wrong side of the road into oncoming northbound traffic. Defendant Buchheit’s tractor-trailer collided into a 2012 Dodge Challenger operated by Jesus Tapia, Jr. Both Defendant Buchheit’s tractor-trailer and Jesus Tapia, Jr.’s vehicle then violently collided into Plaintiffs’ vehicle. As a result of the collision, Plaintiffs suffered injuries.

**VI.**

**CAUSES OF ACTION**

**COUNT 1 – NEGLIGENCE**

9. The foregoing statement of facts are incorporated herein for all purposes.

10. Defendant French’s acts and/or omissions constituted negligence, negligence *per se* and/or gross negligence and were the proximate cause of Plaintiffs sustaining personal injuries in that said Defendant:

a. Drove onto the wrong side of a roadway into oncoming traffic.

11. Defendant Buchheit is jointly and severally liable for Defendant French’s negligent acts and/or omissions under the doctrine of *Respondeat Superior* because Defendant French was in the course and scope of his employment for Defendant Buchheit at the time the negligent acts and/or omissions giving rise to Plaintiffs’ causes of action occurred. In addition, upon information and

belief, a statutory employer/employee relationship existed between Defendant Buchheit and Defendant French. Therefore, the negligence and liability of Defendant French should be imputed to Defendant Buchheit. Moreover, at all times material hereto, upon information and belief, there existed an agency by estoppel relationship between Defendant French and Defendant Buchheit, as a result of which Defendant Buchheit is estopped to deny said agency relationship.

12. Further, at all times material hereto and upon information and belief, Defendant French and Defendant Buchheit had an express or implied agreement among themselves concerning the work of Defendant French. Defendants had a joint interest in the purpose of Defendant French's trip at the time of the collision which makes the basis of this lawsuit. Defendant Buchheit had a pecuniary interest in the work being done and had some voice and right to be heard in the control and management of Defendant French's work whether exercised or not. Therefore, Defendants were involved in a joint enterprise and the negligence and liability of Defendant French should be imputed to Defendant Buchheit.

13. Under Texas law, Defendant Estate is liable for the acts and/or omissions of Jesus Tapia, Jr. that constitute negligence. The following negligent acts and/or omissions by Jesus Tapia, Jr. may have contributed to the cause of the collision and Plaintiffs' injuries:

- a. Failing to keep a proper lookout; or
- b. Failing to timely brake and/or take evasive action to avoid the collision with the tractor-trailer.

14. Discovery is still at its infancy in this case. Further information and evidence, some of which is within the knowledge and/or possession of Defendant(s), will be obtained concerning the above issues that may possibly require additional or different allegations. Therefore, Plaintiffs reserve the right to amend and/or supplement these allegations as allowed by the Texas Rules of



Civil Procedure.

**VII.**

**DAMAGES**

15. As a proximate result and cause of the negligence referenced above, Plaintiffs allege that they sustained damages from which they now suffer and will in all probability will continue to suffer into the future in terms of physical pain, mental anguish, physical impairment and incurring of medical bills and expenses in the past and future. Plaintiff Rosario Camarillo-Cabello has also suffered property damage as a direct and proximate cause of Defendants' negligence. Plaintiffs sue for these damages in an amount within the jurisdictional limits of this Court. Plaintiffs also sue for pre-judgment and post-judgment interest on the items of damages allowed by law.

**VIII.**

**JURY DEMAND**

16. Plaintiffs demand a trial by jury on this case.

**IX.**

**REQUEST FOR DISCLOSURE**

17. Under Texas Rule of Civil Procedure 194, Plaintiffs request that Defendants disclose, within 50 days of the service of this request, the information or material described in Rule 194.2.

**X.**

**PRAYER**

18. For these reasons, Plaintiffs ask that the Court issue citation for Defendants to appear and answer, and that Plaintiffs be awarded judgment against Defendants for the following:

- a. Actual damages as requested herein;
- b. Exemplary damages;

- c. Pre-judgment and post-judgment interest;
- d. Court costs;
- e. All other relief to which Plaintiffs are entitled.

Respectfully submitted,

**Gonzalez Druker Law Firm, PLLC**  
1119 Houston Street  
Laredo, Texas 78040  
T: (956) 728-9191  
F: (956) 452-9990  
E-service: firm@gdlfirm.com

By: /s/ Uriel Druker  
Uriel Druker  
Texas Bar No. 24044867  
Marc Gonzalez  
Texas Bar No. 24049142  
Anali Vargas  
Texas Bar No. 24066233  
Cristina Alva  
Texas Bar No. 24073846

**ATTORNEYS FOR PLAINTIFFS**



Service, Inc., Buchheit Logistics, Inc., Michael Scott French, and the Estate of Jesus Tapia, Jr., and for causes of action would respectfully show this Honorable Court as follows:

### **I. DISCOVERY-CONTROL PLAN**

1. Plaintiffs intend to conduct discovery under Level 3 of Texas Rule of Civil Procedure 190.4.

### **II. CLAIMS FOR RELIEF**

2. Plaintiffs seek monetary relief over \$1,000,000.

### **III. PARTIES**

3. Plaintiffs Rosario Camarillo-Cabello and her minor son, M.A.C., are individuals residing in Laredo, Webb County, Texas.

4. Defendant Buchheit Trucking Service, Inc. (“Buchheit Trucking”) is a Missouri corporation that has entered an appearance for all purposes.

5. Defendant Michael Scott French (“French”) is an individual that has entered an appearance for all purposes.

6. Defendant Estate of Jesus Tapia, Jr. (“Estate”) is an entity established and existing in Webb County under the laws of the State of Texas. It that has entered an appearance for all purposes.

7. Buchheit Logistics, Inc. (“Buchheit Logistics”) is a Missouri Corporation and can be served with process by serving its registered agent at 2431 Horseshoe Ridge, Cape Girardeau, Missouri 63701.

### **IV. VENUE AND JURISDICTION**

8. Venue for this action is proper in Webb County, Texas, pursuant to Texas Civil Practice and Remedies Code §15.002 because the incident in question occurred there. Jurisdiction is proper in this Court because the amount in controversy is greatly in excess of the minimum jurisdictional

limits of this Court.

## **V. FACTS**

9. On September 10, 2019, French was operating a 2006 tractor trailer hauling a load to a destination in Laredo, Texas while in the course and scope of his employment for Buchheit Trucking that also conducts its business as Buchheit Logistics (hereinafter collectively referred to as “Buchheit”).

10. At the time of his delivery of the load in Laredo, Texas, French was feeling ill and believed he was suffering from food poisoning.

11. Employees at the warehouse who unloaded the freight French had delivered noticed that French looked quite ill.

12. French’s legs looked red and swollen up to his knees, he was short of breath, sweating profusely and appeared weak.

13. Warehouse employees felt French was seriously ill and needed immediate emergency medical attention. They offered to call French an ambulance, to which French declined.

14. Instead of picking up the load he was scheduled to pick up that same day (September 10, 2019) to transport out of Laredo, French fell asleep inside his truck outside of the warehouse where his freight has been unloaded.

15. French’s wife became so concerned about French’s medical condition that night that she notified Buchheit of the situation, called 911 emergency in Laredo, Texas from Missouri, and requested an emergency welfare check on French.

16. French declined emergency medical assistance offered by the responding Laredo police officer sent out to do the welfare check.

17. Upon information and belief, Buchheit were aware that French was reportedly ill and that his wife had sought emergency assistance for him. Buchheit were also aware that French was so ill that he had failed to timely pick up the other load he was scheduled to pick up on their behalf that same day. Despite knowing the foregoing, on September 11, 2019, Buchheit instructed French to pick up the load to transport over 300 miles from Laredo to Sugar Land, Texas.

18. Ill and fatigued, French was driving erratically and recklessly the entire way to the location of the load he was instructed to pick-up.

19. Plaintiff Rosario Camarillo-Cabello was operating a 2016 Volkswagen Touareg and traveling northbound on the 5000 block of Bob Bullock Loop (“Loop”) with her minor son, Plaintiff M.A.C., in the front passenger seat.

20. French, who was traveling southbound on the Loop, suddenly crossed over into wrong side of the road into oncoming northbound traffic.

21. French collided into a 2012 Dodge Challenger operated by Jesus Tapia, Jr. Then both French’s tractor trailer and Jesus Tapia, Jr.’s vehicle violently collided into Plaintiffs’ vehicle. As a result of the collision, Plaintiffs suffered serious injuries.

## **VI. CAUSES OF ACTION**

22. The foregoing statement of facts are incorporated herein for all purposes.

### **COUNT 1 – NEGLIGENCE (DEFENDANT FRENCH)**

23. Defendant French had a duty to exercise ordinary care and operate a commercial vehicle as a commercial vehicle driver of ordinary prudence would have done under the same or similar circumstances. However, French breached that duty in one or more of the following respects:

- a. Failing to keep a proper lookout,

- b. Failing to control his speed,
- c. Driving onto the wrong side of a roadway in violation of Texas Transportation Code §545.051,
- d. Failing to timely apply his brakes,
- e. Failing to take proper evasive action,
- f. Operating a commercial motor vehicle while his ability or alertness was impaired, or so likely to become impaired, through fatigue, illness, or any other cause, as to make it unsafe for him to begin or continue to operate the commercial motor vehicle in violation of 49 CFR 392.3,
- g. Making a false and/or misleading statement about his health history, and/or concealing a disqualifying condition, on his medical examination form used for FMCSA medical certification.

24. Each of the foregoing acts and/or omissions, taken together or individually, constitutes negligence. Moreover, each of the foregoing acts and/or omissions, taken together or individually, was a direct and proximate cause of the collision and of the serious injuries and damages sustained by Plaintiffs.

#### **COUNT 2 – NEGLIGENCE *PER SE* (DEFENDANT FRENCH)**

25. Some of Defendant French's negligent acts and/or omissions described above violated a statute and/or rule and constitute negligence as a matter of law because those statutes and/or rules are designed to protect a class of persons to which Plaintiffs belong against the type of injuries they suffered as a result of Defendant French's violation of those statutes and/or rules.

### **COUNT 3 – NEGLIGENCE (DEFENDANTS BUCHHEIT)**

#### ***A. Respondeat Superior***

26. Defendants Buchheit are jointly and severally liable for Defendant French's negligent acts and/or omissions under the doctrine of *Respondeat Superior* because Defendant French was in the course and scope of his employment for Defendants Buchheit at the time the negligent acts and/or omissions giving rise to Plaintiffs' causes of action occurred. Therefore, the negligence and liability of Defendant French should be imputed to Defendants Buchheit.

27. Moreover, at all times material hereto, there existed an agency by estoppel relationship between Defendant French and Defendants Buchheit, as a result of which Defendants Buchheit are estopped to deny said agency relationship.

28. Further, at all times material hereto and upon information and belief, Defendant French and Defendants Buchheit had an express or implied agreement among themselves concerning the work of Defendant French. Defendants had a joint interest in the purpose of Defendant French's trip at the time of the collision which makes the basis of this lawsuit. Defendants Buchheit had a pecuniary interest in the work being done and had some voice and right to be heard in the control and management of Defendant French's work whether exercised or not. Therefore, Defendants were involved in a joint enterprise and the negligence and liability of Defendant French should be imputed to Defendants Buchheit.

#### **B. Negligent supervision**

29. Plaintiffs would show that at the time and on the occasion in question, Defendants Buchheit wrongfully permitted Defendant French to drive a commercial motor vehicle on their behalf in violation of a statute and their own policy and procedures. Specifically, Defendants violated 49 CFR 392.3 because Defendants Buchheit knew or should have known that Defendant French's



ability or alertness to operate the tractor trailer was impaired, or so likely to become impaired, through fatigue, illness, or any other cause, as to make it unsafe for him to begin or continue to operate the commercial motor vehicle and permitted him to drive regardless.

**COUNT 4 – NEGLIGENCE *PER SE* (DEFENDANTS BUCHHEIT TRUCKING AND/OR BUCHHEIT LOGISTICS)**

30. In addition to Defendant French's negligence *per se* being imputed on Defendants Buchheit under the doctrine of *Respondeat Superior*, Defendants Buchheit own negligent acts and/or omissions as described above also violated a statute and/or rule that constitutes negligence as a matter of law because those statutes and/or rules are designed to protect a class of persons to which Plaintiffs belong against the type of injuries they suffered as a result of Defendants Buchheit violation of those statutes and/or rules.

**COUNT 5 – NEGLIGENCE (DEFENDANT ESTATE OF JESUS TAPIA, JR.)**

31. Under Texas law, Defendant Estate is liable for the acts and/or omissions of Jesus Tapia, Jr. that constitute negligence. The following negligent acts and/or omissions by Jesus Tapia, Jr. may have contributed to the cause of the collision and Plaintiffs' injuries:

- a. Failing to keep a proper lookout; or
- b. Failing to timely brake and/or take evasive action to avoid the collision with the tractor-trailer.

32. Each of the foregoing acts and/or omissions, taken together or individually, constitutes negligence. Each act and/or omission was a direct and proximate cause of the collision and of the serious injuries and damages sustained by Plaintiffs.

**VII. DAMAGES**

33. As a proximate result and cause of the negligence referenced above, Plaintiffs allege that they sustained damages from which they now suffer and will in all probability will continue to

suffer into the future as follows:

- a. physical pain,
- b. mental anguish,
- c. physical impairment,
- d. lost wages,
- e. lost earning capacity,
- f. medical expenses,
- g. loss of consortium,
- h. loss of services,
- i. property damages and loss of use of Plaintiff's vehicle.

34. Plaintiffs sue for these damages in an amount within the jurisdictional limits of this Court. Plaintiffs also sue for pre-judgment and post-judgment interest on the items of damages allowed by law.

35. In addition to actual damages, Plaintiffs seek to recover exemplary or punitive damages from Defendants French, Buchheit Trucking and Buchheit Logistics because Defendants conduct was of such character as to constitute gross negligence. Defendants actions in connection with the collision involved an extreme degree of risk considering the probability and magnitude of the potential harm to Plaintiffs and to other users of the public roadways. Defendants had actual subjective knowledge of the risk involved but nevertheless acted in conscious indifference to the rights, safety, and welfare of others, including the Plaintiffs, when Defendant French chose to operate, and was permitted to operate, a tractor trailer, when his ability or alertness to operate the tractor trailer was impaired, or so likely to become impaired, through fatigue, illness, or any other cause, as to make it unsafe for him to begin or continue to operate the commercial motor vehicle.

### **VIII. JURY DEMAND**

36. Plaintiffs demand a trial by jury on this case.

### **IX. REQUEST FOR DISCLOSURE**

37. Under Texas Rule of Civil Procedure 194, Plaintiffs request that Defendants disclose, within 30 days of the service of this request, the information or material described in Rule 194.2.

### **X. INTENT TO USE DOCUMENTS**

38. Plaintiffs hereby give notice of intent to utilize items produced in discovery against the party producing same. The authenticity of such items is self-proven per TRCP 193.7.

### **XI. PRAYER**

39. For these reasons, Plaintiffs ask that the Court issue citation for Defendants to appear and answer, and that Plaintiffs be awarded a judgment against Defendants for the following:

- a. Actual damages as requested herein;
- b. Exemplary damages;
- c. Pre-judgment and post-judgment interest;
- d. Court costs;
- e. All other relief to which Plaintiffs are entitled.

Respectfully submitted,

**Gonzalez Druker Law Firm, PLLC**

1119 Houston Street  
Laredo, Texas 78040  
T: (956) 728-9191  
F: (956) 452-9990  
E-service: firm@gdlfirm.com

By: /s/ Uriel Druker  
Uriel Druker, Attorney in Charge  
Texas Bar No. 24044867  
Marc Gonzalez

Texas Bar No. 24049142  
Cristina Alva  
Texas Bar No. 24073846

**ATTORNEYS FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

I certify that on the 24<sup>th</sup> day of August 2021, a true and correct copy of the foregoing has been served via the specified method on the following:

**VIA E-SERVICE:**

Larry D. Warren  
[lwarren@namanhowell.com](mailto:lwarren@namanhowell.com)  
Georgina Buckley  
[gbuckley@namanhowell.com](mailto:gbuckley@namanhowell.com)  
Naman Howell Smith & Lee, PLLC  
10001 Reunion Place, Suite 600  
San Antonio, Texas 78216  
**ATTORNEYS FOR DEFENDANT BUCHHEIT  
TRUCKING SERVICE, INC.**

Roderick Lopez  
[filings@rlopezpc.com](mailto:filings@rlopezpc.com)  
Law Office of Roderick C. Lopez, P.C.  
6557 Metro Court, Suite 1  
Laredo, Texas 78041  
**ATTORNEY FOR DEFENDANT/CROSS-PLAINTIFF,  
THE ESTATE OF JESUS TAPIA, JR.**

Michael Tuttle  
Cowen Rodriguez Peacock  
[efilings@cowenlaw.com](mailto:efilings@cowenlaw.com)  
Cowen Rodriguez Peacock  
6243 IH 10 West, Suite 801  
San Antonio, Texas 78201  
**ATTORNEY FOR OMAR HERRERA VALDIVIA**

Robert A. Valadez  
[rvaladez@shelton-valadez.com](mailto:rvaladez@shelton-valadez.com)  
Melissa Casey  
[mcasey@shelton-valadez.com](mailto:mcasey@shelton-valadez.com)  
Shelton & Valadez, P.C.  
600 Navarro, Suite 500  
San Antonio, Texas 78205-1860  
**ATTORNEYS FOR DEFENDANT SCOTT MICHAEL FRENCH**

/s/Uriel Druker  
\_\_\_\_\_  
Uriel Druker

**REGISTER OF ACTIONS****CASE No. 2019CVA002071D3****ROSARIO CAMARILLO-CABELLO VS. BUCHHEIT TRUCKING SERVICE INC.,MICHAEL SCOTT FRENCH,ESTATE OF JESUS TAPIA JR,BUCHHEIT LOGISTICS, INC.**§  
§  
§  
§  
§Case Type: **Injury or Damage - Motor Vehicle (DC)**  
Subtype: **Motor Vehicle Accident (DC)**  
Date Filed: **10/17/2019**  
Location: **--341st District Court****PARTY INFORMATION**

<b>Defendant</b>	<b>BUCHHEIT LOGISTICS, INC.</b>	<b>Attorneys</b> <b>LARRY D WARREN</b> <i>Retained</i> 210-731-6350(W)
<b>Defendant</b>	<b>BUCHHEIT TRUCKING SERVICE INC.</b>	<b>LARRY D WARREN</b> <i>Retained</i> 210-731-6350(W)
<b>Defendant</b>	<b>ESTATE OF JESUS TAPIA JR</b>	<b>RODERICK C LOPEZ</b> <i>Retained</i> 956-568-5028(W)
<b>Defendant</b>	<b>FRENCH, MICHAEL SCOTT</b>	<b>ROBERT A VALADEZ</b> <i>Retained</i> 2103490515 x2103493666(W)
<b>Plaintiff</b>	<b>CAMARILLO-CABELLO, ROSARIO</b>	<b>URIEL DRUKER</b> <i>Retained</i> 956-728-9191(W)

**EVENTS & ORDERS OF THE COURT**

	DISPOSITIONS		
05/15/2020	<b>Change of Venue Transfer</b> (Judicial Officer: Palomo, Beckie) Comment (NOTICE OF FILING TO REMOVE CAUSE TO UNITED STATES DISTRICT COURT, SOUTHERN DISTRICT OF TEXAS - LAREDO DIVISION)		
	OTHER EVENTS AND HEARINGS		
10/17/2019	<b>Civil Case Filed (OCA)</b>		
10/17/2019	<b>Original Petition</b> <i>ORIGINAL PETITION AND REQUEST FOR DISCLOSURE. (DV)</i>		
10/18/2019	<b>Calendar Call</b> <i>FAXED THE CALENDAR CALL TO ATTORNEY URIEL DRUKER. (DV)</i>		
10/18/2019	<b>Notes-Miscellaneous</b> <i>SHORT \$24 FOR ISSUANCE. NO CITATONS ISSUED AT THIS TIME DUE TO SHORTAGE OF PAYMENT AND COPIES. (DV)</i>		
10/21/2019	<b>Citation-Issuance</b> <i>(6) CITATIONS ISSUED AS TO BUCHHEIT TRUCKING SERVICE INC, MICHAEL SCOTT FRENCH AND THE ESTATE OF JESUS TAPIA JR. AND</i>		
10/21/2019	<b>Citation</b>	BUCHHEIT TRUCKING SERVICE INC.	Unserved
		FRENCH, MICHAEL SCOTT	Unserved
		ESTATE OF JESUS TAPIA JR	Unserved
10/21/2019	<b>Counter Petition</b> <i>ORIGINAL ANSWER AND CROSS-CLAIM.</i>		
10/22/2019	<b>Citation Return-Executed</b> <i>CITATION RETURNED EXECUTED AS TO JESUS TAPIA {DOS: 10/21/19}</i>		
10/23/2019	<b>Citation-Issuance</b> <i>(2) CITATIONS (CROSS CLAIM) ISSUED AS TO BUCHHEIT TRUCKING SERVICE INC. BY SERVING RON GJERSTAD, PLACED IN PRIVATE SERVER'S BOX.</i>		
10/23/2019	<b>Citation-Issuance</b> <i>(2) CITATIONS (CROSS CLAIM) ISSUED AS TO SCOTT MICHAEL FRENCH, PLACED IN PRIVATE SERVER'S BOX.</i>		
10/23/2019	<b>Citation</b>	BUCHHEIT TRUCKING SERVICE INC.	Served 10/21/2019 Returned 10/30/2019
10/23/2019	<b>Citation</b>	FRENCH, MICHAEL SCOTT	Served 10/21/2019 Returned 10/30/2019
10/30/2019	<b>Citation Return-Executed</b> <i>CITATION RETURN EXECUTED AS TO BUCHHEIT TRUCKING SERVICE INC. BY SERVING RON GJERSTAD. (DATE OF SERVICE 10/21/19)</i>		
10/30/2019	<b>Citation Return-Executed</b> <i>CITATION RETURN EXECUTED AS TO MICHAEL SCOTT FRENCH (DATE OF SERVICE 10/21/19)</i>		

11/04/2019 **Subpoena Executed**  
SUBPOENA RETURN EXECUTED AS TO MANUEL J. OSORIO. (DATE OF SERVICE 10/30/19)

11/04/2019 **Answer-Miscellaneous**  
DEFENDANT, BUCHHEIT TRUCKING SERVICE, INC.'S ORIGINAL ANSWER TO DEFENDANT/CROSS-PLAINTIFF, THE ESTATE OF JESUS TAPIA, JR.'S CROSS-CLAIM

11/04/2019 **Answer-Miscellaneous**  
DEFENDANT, BUCHHEIT TRUCKING SERVICE, INC.'S ORIGINAL ANSWER TO PLAINTIFFS' ORIGINAL PETITION.

11/06/2019 **Intervention**  
OMAR HERRERA VALDIVIA'S ORIGINAL PETITION IN INTERVENTION AND DISCOVERY REQUESTS. (FEES PAID FOR INTERVENTION)

11/08/2019 **Answer-Defendant**  
DEFENDANT, BUCHHEIT TRUCKING SERVICE, INC.'S ORIGINAL ANSWER TO INTERVENOR, OMAR HERRERA VALDIVIA'S PETITION IN INTERVENTION

11/12/2019 **Notice Of Deposition**  
NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS, RE: WEBB COUNTY MEDICAL EXAMINER'S OFFICE.

11/13/2019 **Certificate Of Discovery**  
DEFENDANT BUCHHEIT TRUCKING SERVICE, INC.'S CERTIFICATE OF WRITTEN DISCOVERY.

11/15/2019 **Notice Of Filing**  
NOTICE OF FILING BUSINESS RECORDS AFFIDAVIT.

11/15/2019 **Citation Return-Executed**  
CITATION RETURN EXECUTED AS TO SCOTT MICHAEL FRENCH (DATE OF SERVICE 10/29/19)

11/15/2019 **Citation Return-Executed**  
CITATION RETURN EXECUTED AS TO BUCHHEIT TRUCKING SERVICE INC. (DATE OF SERVICE 10/29/19)

11/25/2019 **Notice of Intent**  
NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS

11/27/2019 **Answer-Defendant**  
DEFENDANT MICHAEL SCOTT FRENCH'S ORIGINAL ANSWER AND REQUESTS FOR DISCLOSURE

12/02/2019 **Notice of Intent**  
AMENDED NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS

12/12/2019 **Rule 11 Agreement**  
LETTER FROM GONZALEZ BRUKER LAW FIRM - DATED 12/12/19 FILING A RULE 11 AGREEMENT

12/16/2019 **Certificate Of Discovery**  
CERTIFICATE OF WRITTEN DISCOVERY

12/20/2019 **Certificate Of Discovery**  
CERTIFICATE OF WRITTEN DISCOVERY

12/27/2019 **Certificate Of Discovery**  
CERTIFICATE OF WRITTEN DISCOVERY.

01/08/2020 **Calendar Call** (1:30 PM) (Judicial Officer Palomo, Beckie)

01/08/2020 **Notes-Hearing Notes**  
CASE CALLED. HONORABLE JUDGE BECKIE PALOMO PRESIDING. COURT REPORTER, ANA ALCANTAR. ATTORNEY CRISTINA ALVA PRESENT FOR PLAINTIFF. ATTORNEYS REBECCA MAROGUIN AND GEORGINA BUCKLEY PRESENT FOR DEFENDANT. HEARING ON 1ST CALENDAR CALL HELD. A NEW PRE-TRIAL GUIDELINE ORDER WILL BE FILED.

01/14/2020 **Motion To Compel**  
MOTION TO COMPEL RESPONSES TO REQUESTS FOR DISCLOSURE

01/14/2020 **Notice Of Hearing**  
NOTICE OF HEARING...RECEIVED AND SENT TO COURT COORDINATOR.

01/15/2020 **Certificate Of Discovery**  
CERTIFICATE OF WRITTEN DISCOVERY

01/16/2020 **Notice Of Hearing**  
NOTICE OF HEARING (MOTION TO COMPEL REPOSSES TO REQUEST FOR DISCLOSURE ) SET FOR 01/22/20 AT 9 AM. SIGNED ON 01/15/20 BY JUDGE PALOMO. COPIES EMAILED TO FAXED TO ATTORNEYS (URIEL DRUKER, ROBERT VALDEZ, LARRY WARNER, AND RODERICK LOPEZ) AND COWEN LAW FIRM.

01/21/2020 **Certificate Of Deposition**  
DEPOSITION BY WRITTEN QUESTIONS TO CUSTODIAN OF RECORDS RE: LAREDO POLICE DEPARMTNE (CHARGED TO DEFENDANT \$510.11).

01/21/2020 **Notice of Intent**  
NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS

01/21/2020 **Notice of Intent**  
NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS

01/21/2020 **Notice of Intent**  
NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS

01/21/2020 **Notice of Intent**  
NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS

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01/21/2020 **Notice of Intent**  
NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS

01/21/2020 **Notice of Intent**  
NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS

01/21/2020 **Notice-Miscellaneous**  
LETTER FROM RODERICK C. LOPEZ, P.C. ATTORNEY AT LAW - PARTIES HAVE RESOLVED THE DISCOVERY DISPUTE AND HEARING IS NO LONGER NECESSARY.

01/22/2020 **CANCELED Motion to Compel** (9:00 AM) (Judicial Officer Palomo, Beckie)  
Cancelled

01/22/2020 **Notice of Intent**  
AMENDED NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS

01/22/2020 **Notice of Intent**  
NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS

01/22/2020 **Proposed Order**  
PROPOSED PRETRIAL GUIDELING ORDER. SENT TO COURT COORDINATOR

01/22/2020 **Notes-Hearing Notes**  
CASE NOT CALLED. NO PROCEEDINGS HELD.

01/23/2020 **Motion To Quash**  
MOTION TO QUASH AND MOTION FOR PROTECTION FROM DISCOVERY

01/23/2020 **Notice Of Hearing**  
NOTICE OF HEARING (RECEIVED, SENT TO COURT COORDINATOR)

01/23/2020 **Proposed Order**

PROPOSED ORDER ON MOTION FOR PROTECTION FROM DISCOVERY (RECEIVED)

01/23/2020 **Atty Request - Miscellaneous**  
 REQUEST FOR BUCHHEIT TRUCKING SERVICE, INC.'S PRIVILEGE LOG

01/23/2020 **Order-Pretrial Guideline Order**  
 PRETRIAL GUIDELING ORDER (LEVEL 3) SIGNED ON 01/23/20 BY JUDGE PALOMO. FINAL PRE-TRIAL CONFERENCE SET FOR 10/26/20. JURY/BENCH TRIAL SET FOR 11/16/20. COPIES EMAILED TO ATTORNEYS (ROBERT VALDEZ, LARRY WARREN, URIEL DRUKER, RODERICK C. LOPEZ, DAVIDE COATES, DYLAN PEARCY) BY COURT STAFF

01/27/2020 **Notice Of Hearing**  
 NOTICE OF HEARING (MOTION TO QUASH AND MOTION FOR PROTECTION FOR DISCOVERY) SET FOR 02/19/20 AT 9 AM. SIGNED ON 01/27/20 BY JUDGE PALOMO. COPIES EMAILED TO ATTORNEYS RODERICK C. LOPEZ, LARRY D. WARREN, GEORGINA BUCKLEY, ROBERT A. VALDEZ, DAVID COATES S. DYLAN PEARCY AND GONZALEZ DRUKER LAW FIRM BY COURT STAFF

01/31/2020 **Notice of Intent**  
 NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS

01/31/2020 **Notice of Intent**  
 NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS

02/03/2020 **Motion To Quash**  
 PLAINTIFF'S MOTION TO QUASH NOTICES OF DEPOSITION OF ROSARIO CAMARILLO-CABELLO AND MIGUEL ANGEL CABELLO. FILED BY ATTORNEY URIEL DRUKER

02/04/2020 **Notice-Miscellaneous**  
 PROPOSED NOTICE OF HEARING. SENT TO COURT COORDINATOR. FILED BY ATTORNEY LARRY WARREN

02/04/2020 **Objections**  
 PLAINTIFF ROSARIO CAMARILLO-CABELLO'S OBJECTIONS, MOTION TO QUASH AND MOTION FOR PROTECTIVE ORDER REGARDING MEDICAL RECORDS. FILED BY ATTORNEY URIEL DRUKER.

02/05/2020 **Notice Of Hearing**  
 NOTICE OF HEARING (PLAINTIFF'S MOTION TO QUASH DEFENDANT'S FIRST AMENDED NOTICE TO TAKE ORAL DEPOSITION OF ROSARIO CAMARILLO-CABELLO AND MIGUEL ANGEL CABELLO) SET FOR 02/19/20 AT 9 AM. SIGNED ON 02/04/20 BY JUDGE PALOMO. COURT STAFF EMAILED COPIES TO: DCOATES@SHELTON-VALADEZ FIRM@GDLFIRM EFILINGS@COWENLAW FILINGS@RLOPEZPC LWARREN@NAMANHOWELL RVALADEZ@SHELTON-VALADEZ

02/12/2020 **Notice Of Hearing**  
 PROPOSED NOTICE OF HEARING. SENT TO COURT COORDINATOR

02/13/2020 **Notice Of Hearing**  
 NOTICE OF HEARING (OBJECTIONS) SET FOR 02/19/20 AT 9 AM. SIGNED ON 02/12/2020 BY JUDGE PALOMO. COURT STAFF EMAILED COPIES TO DCOATES@SHELTON-VALADEZ FIRM@GDLFIRM EFILINGS@COWENLAW FILINGS@RLOPEZ LWARREN@NAMANHOWELL RVALADEZ@SHELTON-VALADEZ

02/13/2020 **Motion To Compel**  
 PLAINTIFF'S MOTION TO COMPEL ANSWERS TO INTERROGATORIES FROM DEFENDANT BUCHEIT TRUCKING SERVICE, INC.

02/13/2020 **Notice Of Hearing**  
 PROPOSED NOTICE OF HEARING - MOTION TO COMPEL ANSWERS TO INTERROGATORIES FROM DEFENDANT BUCHEIT TRUCKING SERVICE. SENT TO COURT COORDINATOR

02/13/2020 **Motion To Compel**  
 MOTION TO COMPEL ANSWERS TO INTERROGATORIES FROM SCOTT MICHAEL FRENCH

02/13/2020 **Notice Of Hearing**  
 PROPOSED NOTICE OF HEARING -MOTION TO COMPEL ANSWERS TO INTERROGATORIES FROM SCOTT MICHAEL FRENCH. SENT TO COURT COORDINATOR

02/14/2020 **Motion For Entry**  
 MOTION FOR ENTRY OF LEVEL 3 DISCOVERY-CONTROL PLAN. FILED BY RODERICK C. LOPEZ

02/14/2020 **Proposed Order**  
 NOTICE OF HEARING (MOTION FOR ENTRY OF LEVEL 3 DISCOVERY-CONTROL PLAN). SENT TO COURT COORDINATOR.

02/14/2020 **Proposed Order**  
 PROPOSED LEVEL 3 DISCOVERY-CONTROL PLAN

02/14/2020 **Notice Of Appearance**  
 NOTICE OF APPEARANCE AND DESIGNATION OF LEAD COUNSEL. FILED BY MICHAEL D. TUTTLE

02/14/2020 **Motion To Compel**  
 MOTION TO COMPEL RESPONSES TO REQUESTS FOR PRODUCTION FROM DEFENDANT SCOTT MICHAEL FRENCH

02/14/2020 **Proposed Order**  
 NOTICE OF HEARING (MOTION TO COMPEL RESPONSES TO REQUESTS FOR PRODUCTION FROM DEFENDANT SCOTT MICHAEL FRENCH). SENT TO COURT COORDINATOR

02/18/2020 **Notice Of Hearing**  
 NOTICE OF HEARING (MOTION TO COMPEL RESPONSES TO REQUEST FOR PRODUCTION FROM SCOTT MICHAEL FRENCH) SET FOR 02/19/2020 AT 9:00 AM. SIGNED ON 2/14/2020 BY JUDGE BECKIE PALOMO. EMAILED TO ATTORNEYS FILINGS@RLOPEZPC LWARREN@NAMANHOWELL GBUCKLEY@NAMHOWELL RVALADEZ@SHELTON-VALADEZ DCOATES@SHELTON-VALADEZ FIRM@GDLFIRM EFILINGS@COWENLAW BY COURT COORDINATOR

02/18/2020 **Notice Of Hearing**  
 NOTICE OF HEARING (MOTION FOR ENTRY OF LEVEL 3 DISCOVERY=CONTROL PLAN) SET FOR 02/19/2020 AT 9:00 AM. SIGNED ON 02/14/2020 BY JUDGE BECKIE PALOMO. EMAILED TO ATTORNEYS FILINGS@RLOPEZPC LWARREN@NAMANHOWELL GBUCKLEY@NAMHOWELL RVALADEZ@SHELTON-VALADEZ DCOATES@SHELTON-VALADEZ FIRM@GDLFIRM EFILINGS@COWENLAW BY COURT COORDINATOR

02/18/2020 **Notice Of Hearing**  
 NOTICE OF HEARING (MOTION TO COMPEL DISCOVERY FROM DEFENDANT SCOTT MICHAEL FRENCH) SET FOR 02/19/2020 AT 9:00 AM. SIGNED ON 2/14/2020 BY JUDGE BECKIE PALOMO EMAILED TO ATTORNEYS FILINGS@RLOPEZPC LWARREN@NAMANHOWELL GBUCKLEY@NAMHOWELL RVALADEZ@SHELTON-VALADEZ DCOATES@SHELTON-VALADEZ FIRM@GDLFIRM EFILINGS@COWENLAW BY COURT COORDINATOR

02/18/2020 **Notice Of Hearing**  
 NOTICE OF HEARING (MOTION TO COMPEL ANSWERS TO INTERROGATORIES FROM DEFENDANT BUCHHEIT TRUCKING SERVICE, INC.) SET FOR 02/19/2020 AT 9:00 AM. SIGNED ON 02/14/2020 BY JUDGE BECKIE PALOMO. EMAILED TO ATTORNEYS FILINGS@RLOPEZPC LWARREN@NAMANHOWELL GBUCKLEY@NAMHOWELL RVALADEZ@SHELTON-VALADEZ DCOATES@SHELTON-VALADEZ FIRM@GDLFIRM EFILINGS@COWENLAW BY COURT COORDINATOR

02/18/2020 **Rule 11 Agreement**  
 RULE 11 AGREEMENT RE: RESET HEARINGS FOR 02/19/2020. EMAILED TO COURT COORDINATOR

02/19/2020 **Motion Hearing (9:00 AM) ()**  
 (1) MTN TO QUASH AND MTN FOR PROTECTION FROM DISCOVERY FILED BY DEFT/CROSS PLAINTIFF THE ESTATE OF JESUS TAPIA JR; (2) DEFT BUCHHEIT TRUCKING SERVICE NOTICE OF HEARING ON PLAINTIFF MTN TO QUASH DEFTS 1ST AMMENDED NOTICE TO TAKE ORAL DEPO OF ROSARIO CAMARILLO AND MIGUEL ANGEL CABELLO (3) THE OBJECTIONS MTN TO QUASH AND MTN FOR



PROTECTIVE ORDER REGARDING MEDICAL RECORDS OF ROSARIO CAMARILLO-CABELLO AND MIGUEL ANGEL CABELLO FILED BY PLAINTIFFS

02/19/2020 **Notes-Hearing Notes**  
CASE CALLED. HONORABLE JUDGE BECKIE PALOMO PRESIDING. COURT REPORTER ANA ALCANTAR. ATTORNEYS CRISTINA ALVA AND RODERICK LOPEZ PRESENT FOR ROSARIO CAMARILLO-CABELLO. ATTORNEY DAVID COATES PRESENT FOR DEFENDANT. HEARING ON MOTION HEARING HELD. PLAINTIFFS ATTORNEYS REQUESTED FOR MICHAEL SCOTT FRENCH TO PROVIDE HIS PERSONAL COMMUNICATION DEVICES SUCH AS PHONE, PHONE RECORDS, TABLET AND JUDGE GRANTED REQUEST. THE GPS WAS RULED AS DEFERRED. REQUEST FOR PRODUCTION ON MEDICAL AND PSYCHOLOGICAL CONDITIONS REQUESTED, MEDICAL RECORDS BEFORE AND AFTER ACCIDENT FOR 10 YEARS BACK WAS GRANTED. NO LIMIT ON RECORDS OF MEDICAL.

02/21/2020 **Proposed Order**  
PROPOSED NOTICE OF HEARING. RECEIVED/SENT TO COURT COORDINATOR.

02/24/2020 **Notice Of Hearing**  
NOTICE OF HEARING SIGNED BY JUDGE BECKIE PALOMO. CASE SET FOR 3/11/2020 AT 8:30 AM. NOTICE SENT BY COURT COORDINATOR. CONFIRMATION ATTACHED.

02/25/2020 **Proposed Order**  
NOTICE OF HEARING FILED BY ATTORNEY URIEL DRUKER. NOTICE SENT TO COURT COORDINATOR FOR FURTHER PROCESS

02/25/2020 **Notice Of Hearing**  
NOTICE OF HEARING (OBJECTIONS, MOTION TO QUASH AND MOTION FOR PROTECTIVE ORDER REGARDING MEDICAL RECORDS) SIGNED BY JUDGE BECKIE PALOMO. CASE SET FOR 3/11/2020 AT 8:30 AM. NOTICE SENT BY COURT COORDINATOR. CONFIRMATION ATTACHED.

02/27/2020 **Certificate Of Discovery**  
CERTIFICATE OF WRITTEN DISCOVERY.

03/04/2020 **Motion To Compel**  
DEFENDANT'S MOTION TO COMPEL PLAINTIFF'S RESPONSES TO DEFENDANT'S FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION (NO FIAT/ORDER ATTACHED) FILED BY ATTORNEY GEORGINA E. BUCKLEY

03/04/2020 **Proposed Order**  
ORDER ON DEFENDANT'S MOTION TO COMPEL (RECEIVED)

03/04/2020 **Proposed Order**  
PROPOSED NOTICE OF HEARING. RECEIVED/SENT TO COURT COORDINATOR.

03/05/2020 **Notice Of Hearing**  
NOTICE OF HEARING (DEFENDANT'S MOTION TO COMPEL PLAINTIFF'S RESPONSE TO DEFENDANT'S FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION) SET FOR 03/11/2020 AT 8:30 AM. SIGNED ON 03/04/20 BY JUDGE PALOMO. COURT STAFF EMAILED COPIES TO FILINGS@RLOPEZPC LWARREN@NAMANHOWELL RVALADEZ@SHELTON-VALADEZ DCOATES@SHELTON-VALADEZ FIRM@GDLFIRM EFILINGS@COWENLAW GUCKLEY@NAMANHOWELL DYLAN@COWENLAW

03/05/2020 **Motion-Miscellaneous**  
MOTION TO CHALLENGE OBJECTIONS & ASSERTIONS OF PRIVILEGE, MOTION TO COMPEL RESPONSES TO WRITTEN DISCOVERY REQUESTS, AND MOTION TO COMPEL A PRIVILEGE LOG FROM DEFENDANT TRUCKING SERVICE, INC.

03/05/2020 **Proposed Order**  
PROPOSED NOTICE OF HEARING. SENT TO COURT COORDINATOR

03/06/2020 **Notice Of Hearing**  
NOTICE OF HEARING (MOTION TO CHALLENGE OBJECTIONS AND ASSERTIONS OF PRIVILEGE, MOTION TO COMPEL RESPONSES TO WRITTEN DISCOVERY REQUESTS, AND MOTION TO COMPEL A PRIVILEGE LOG FROM DEFENDANT BUCHHEIT TRUCKING SERVICE, INC.) SET FOR 03/11/2020 AT 8:30 AM. SIGNED BY JUDGE PALOMO 03/06/2020. COURT COORDINATOR EMAILED COPIES TO FILINGS@RLOPEZPC LWARREN@NAMANHOWELL RVALADEZ@SHELTON-VALADEZ FIRM@GDLFIRM EFILINGS@COWENLAW GBUCKLEY@NAMANHOWELL DYLAN@COWENLAW

03/06/2020 **Motion-Miscellaneous**  
DEFENDANT SCOTT MICHAEL FRENCH'S MOTION FOR PROTECTIVE ORDER. FILED BY ATTORNEY ROBERT VALADEZ. ATTACHED WITH NOTICE OF HEARING, SENT TO COURT COORDINATOR.

03/09/2020 **Notice Of Hearing**  
NOTICE OF HEARING (DEFENDANT SCOTT MICHAEL FRENCH'S MOTION FOR PROTECTIVE ORDER) SET FOR 3/11/2020 AT 8:30 AM. SIGNED BY JUDGE BECKIE PALOMO EMAILED TO ATTORNEYS BY COURT COORDINATOR: EFILINGS@COWENLAW. FIRM@GDLFIRM DYLAN@COWENLAW GBUCKLEY@NAMANHOWELL FILINGS@RLOPEZPC DCOATES@SHELTON-VALADEZ RVALADEZ@SHELTON-VALADEZ

03/10/2020 **Certificate Of Deposition**  
RULE 203 CERTIFICATION -RECORDS PERTAINING TO: MIGUEL ANGEL CABELLO. \$188.70 CHARGED TO DEFENDANT

03/10/2020 **Certificate Of Deposition**  
RULE 203 CERTIFICATION. RECORDS PERTAINING TO: MIGUEL ANGEL CABELLO \$201.90 CHARGED TO DEFENDANT

03/10/2020 **Proposed Order**  
ORDER ON DEFENDANT SCOTT MICHAEL FRENCH'S MOTION FOR PROTECTIVE ORDER (RECEIVED, SENT TO COURT) FILED BY ATTORNEY ROBERT VALADEZ

03/10/2020 **Rule 11 Agreement**  
LETTER FROM GONZALEZ DRUKER LAW FIRM - DATED 3/10/2020 - FILING A RULE 11 AGREEMENT (FILED BY ATTORNEY URIEL DRUKER)

03/11/2020 **CANCELED Motion Hearing** (8:30 AM) (Judicial Officer Palomo, Beckie)  
Cancelled  
(1) PLAINTIFFS MTN TO QUASH NOTICES OF DEPOSITION OF ROSARIO CAMARILLO-CABELLO AND MIGUEL ANGEL CABELLO; (2) PLAINTIFF MTN TO QUASH DEFT FIRST AMENDED NOTICE TO TAKE ORAL DEPO OF ROSARIO CAMARILLO-CABELLO AND MIGUEL ANGEL CABELLO (3) PLAINTIFFS ROSARIO CAMARILLO-CABELLO'S OBJECTIONS, MTN TO QUASH AND MTN FOR PROTECTIVE ORDER REGARDING MEDICAL RECORDS (4) MTN TO QUASH AND MTN FOR PROTECTION FROM DISCOVERY FILED BY DEFT/CROSS-PLAINTIFF THE ESTATE OF JESUS TAPIA JR., BY AND THROUGH JESUS TAPIA III, INDIVIDUALLY AS WRONGFUL DEATH BENEFICIARY AND REPRESENTATIVE OF THE ESTATE OF JESUS TAPIA JR. (5) MOTION TO COMPEL ANSWER TO INTERROGATORIES FROM BUCHHEIT TRUCKING SERVICES, INC. DILE BY DEFTS/CROSS-PLAINTIFF THE ESTATE OF JESUS TAPIA JR. BY AND THROUGH JESUS TAPIA, III INDIVIDUALLY AS WRONGFUL DEATH BENEFICIARY AND REPRESENTATIVE OF THE ESTATE OF JESUS TAPIA, JR. (6) MOTION TO ENTRY OF LEVEL 3 DISCOVERY-CONTROL PLAN FILED BY DEFTS/CROSS PLAINTIFF THE ESTATE OF JESUS TAPIA JR., III INDIVIDUALLY AS WRONGFUL DEATH BENEFICIARY AND REPRESENTATIVE OF THE ESTATE OF JESUS TAPIA, JR. (7) THE OBJECTIONS, MTN TO QUASH AND MTN FOR PROTECTIVE ORDER REGARDING MEDICAL RECORDS OF ROSARIO AND MIGUEL ANGEL CABELLO. (8) DEFTS MTN TO COMPEL PLAINTIFF'S RESPONSES TO DEFTS FIRST SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION (9) MTN TO CHALLENGE OBJECTIONS AND ASSERTIONS OF PRIVILEGE, MTN TO COMPEL RESPONSES TO WRITTEN DISCOVERY REQUESTS AND MTN TO COMPEL A PRIVILEGE LOG FROM DEFT BUCHEIT TRUCKING SERVICES FILED BY DEFTS (10) DEFT SCOTT MICHAEL FRENCH MTN FOR PROTECTIVE ORDER

03/11/2020 **Notes-Hearing Notes**  
CASE NOT CALLED. NO PROCEEDINGS HELD.

03/12/2020 **Certificate Of Deposition**  
RULE 203 CERTIFICATION. RECORDS PERTAINING TO: MIGUEL ANGEL CABELLO. \$188.70 CHARGED TO DEFENDANT.

03/12/2020	<b>Certificate Of Deposition</b> RULE 203 CERTIFICATION. RECORDS PERTAINING TO: MIGUEL ANGEL CABELLO. \$201.90 CHARGED TO DEFENDANT
03/12/2020	<b>Notice of Intent</b> NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS
03/16/2020	<b>Certificate Of Deposition</b> RULE 203 CERTIFICATION - RECORDS PERTAINING TO :ROSARIO CAMARILLO-CABELLO. CITY OF LAREDO -PAYROLL. \$519.70 CHARGED TO DEFENDANT
03/16/2020	<b>Motion To Quash</b> DEFENDANTS' MOTION TO QUASH PLAINTIFF'S DEPOSITION BY WRITTEN QUESTIONS
03/16/2020	<b>Certificate Of Deposition</b> RULE 203 CERTIFICATION. RECORDS PERTAINING TO ROSARIO CAMARILLO CABELLO. RECORDS FOR MYRTHALA ALEJO, LPC-MEDICAL. (\$207.40 CHARGED TO DEFENDANT)
03/17/2020	<b>Certificate Of Deposition</b> RULE 203 CERTIFICATION. RECORDS PERTAINING TO: ROSARIO CAMARILLO-CABELLO (CITY OF LAREDO - PAYROLL) \$519.70 CHARGED TO DEFENDANT
03/20/2020	<b>Certificate Of Deposition</b> RULE 203 CERTIFICATION. RECORDS PERTAINING TO OMAR HERRERA VALDIVLA. WITNESS/CUSTODIAN RECORDS FOR LAREDO FAMILY HEALTH CENTER - RADIOLOGY. (\$245.00 CHARGED TO DEFENDANT)
03/20/2020	<b>Proposed Order</b> NOTICE OF HEARING. RECEIVED AND SENT TO COURT COORDINATOR
03/24/2020	<b>Certificate Of Deposition</b> RULE 203 CERTIFICATION. RECORDS PERTAINING TO: OMAR HERRERA VALDIVIA. \$327.40 CHARGED TO DEFENDANT
03/24/2020	<b>Certificate Of Deposition</b> RULE 203 CERTIFICATION. RECORDS PERTAINING TO: OMAR HERRERA VALDIVIA - LAREDO FAMILY HEALTH CENTER (BILLING) \$328.80 CHARGED TO DEFENDANT
03/26/2020	<b>Certificate Of Deposition</b> RULE 203 CERTIFICATION. RECORDS PERTAINING TO: OMAR HERRERA VALDIVIA - LMJ IMAGING SERVICES OPEN MRI, INC. (BILLING) \$171.45 CHARGED TO DEFENDANT
03/26/2020	<b>Certificate Of Deposition</b> RULE 203 CERTIFICATION. RECORDS PERTAINING TO: OMAR HERRERA VALDIVIA. LMJ IMAGING SERVICES OPEN MRI, INC. (MEDICAL) \$175.30 CHARGED TO DEFENDANT
03/26/2020	<b>Notice Of Delivery</b> NOTICE OF DELIVERY RE: WEBB COUNTY MEDICAL EXAMINER'S OFFICE (AUTOPSY)
03/27/2020	<b>Certificate Of Deposition</b> RULE 203 CERTIFICATION RECORDS PERTAINING TO: ROSARIO CAMARILLO-CABELLO FROM LMJ IMAGING SERVICES OPEN MRI, INC.-MEDICAL \$336.00 PAID BY ATTORNEY LARRY D. WARREN.
03/27/2020	<b>Certificate Of Deposition</b> RULE 203 CERTIFICATION RECORDS PERTAINING TO ROSARIO CAMARILLO-CABELLO FROM LMJ IMAGING SERVICES OPEN MRI, INC.-BILLING \$331.60 PAID BY ATTORNEY LARRY D. WARREN.
03/27/2020	<b>Certificate Of Deposition</b> RULE 203 CERTIFICATION {RE: TRINITY CENTER OPEN MRI} CHARGED TO DEFENDANT \$338.20.
03/27/2020	<b>Certificate Of Deposition</b> RULE 203 CERTIFICATION {RE: TRINITY CENTER OPEN MRI-BILLING} CHARGED TO DEFENDANT \$331.60.
03/27/2020	<b>Certificate Of Deposition</b> RULE 203 CERTIFICATION {RE: LMJ IMAGING SERVICES OPEN MRI, INC.-RADIOLOGY} CHARGED TO DEFENDANT \$505.39.
03/31/2020	<b>Certificate Of Deposition</b> RULE 203 CERTIFICATION RE: LMJ IMAGING SERVICES OPEN MRI, INC. - RADIOLOGY (\$211.00 CHARGED TO DEFENDANT)
04/01/2020	<b>Proposed Order</b> ORDER ON MOTION TO COMPEL ANSWERS TO INTERROGATORIES AND MOTION TO COMPEL RESPONSES TO REQUESTS FOR PRODUCTION FROM DEFENDANT SCOTT MICHAEL FRENCH HEARD ON FEBRUARY 19, 2020. FILED BY ATTORNEY RODERICK CARLOS LOPEZ
04/02/2020	<b>Motion Hearing</b> (1:30 PM) (Judicial Officer Palomo, Beckie)
04/02/2020	<b>Notice Of Filing</b> NOTICE OF FILING RULE 11 AGREEMENT
04/02/2020	<b>Notes-Hearing Notes</b> CASE CALLED. HONORABLE JUDGE BECK PALOMO PRESIDING. COURT REPORTER ANA ALCANTAR. MOTIONS HEARING FOR 10 MOTIONS HELD VIA VIDEO AND TELEPHONE CONFERENCE. ATTORNEY URIEL DRUKER PRESENT FOR PLAINTIFF. ATTORNEY GEORGINA BUCKLEY PRESENT FOR DEFENDANT BUCHHEIT TRUCKING SERVICE INC. ATTORNEY RODERICK C. LOPES PRESENT FOR DEFENDANT ESTATE OF JESUS TAPIA JR. ATTORNEY DAVID COATES PRESENT FOR DEFENDANT MICHAEL SCOTT FRENCH. ATTORNEY MICHAEL TUTTLE PRESENT FOR INTERVENOR. PARTIES CAME TO A RULE 11 AGREEMENT ON MOTIONS: 1) PLAINTIFFS MOTION TO QUASH NOTICES OF DEPOSITION OF ROSARIO CAMARILLO-CABELLO AND MIGUEL ANGEL CABELLO 2) PLAINTIFF MOTIN TO QUASH DEFENDANT'S FIRST AMENDED NOTICE TO TAKE ORAL DEPO OF ROSARIO CAMARILLO-CABELLO AND MIGUEL ANGEL CABELLO 3) PLAINTIFFS ROSARIO CAMARILLO-CABELLO'S OBJECTIONS, MTN TO QUASH AND MTN FOR PROTECTIVE ORDER REGARDING MEDICAL RECORDS 7) THE OBJECTIONS, MTN TO QUASH AND MTN FOR PROTECTIVE ORDER REGARDING MEDICAL RECORDS OF ROSARIO AND MIGUEL ANGEL CABELLO 8) DEFENDANTS MOTION TO COMPEL PLAINTIFF'S RESPONSES TO DEFTS FIRST SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION PARTIES CAME TO AGREEMENT ON MOTIONS: 4) MOTION TO QUASH AND MTN FOR PROTECTION FROM DISCOVERY 5) MOTION TO COMPEL ANSWER TO INTERROGATORIES FROM BUCHHEIT TRUCKING SERVICES, INC. 9) MOTION TO CHALLENGE OBJECTIONS AND ASSERTIONS OF PRIVILEGE, MOTION TO COMPEL RESPONSES TO WRITTEN DISCOVERY REQUESTS AND MOTION TO COMPEL A PRIVILEGE LOG FROM DEFT BUCHEIT TRUCKING SERVICES JUDGE GRANTED MOTION TO ENTRY OF LEVEL 3 DISCOVERY CONTROL PLAN. COURT STAFF WILL LOOK INTO SECTION 4A OF PROPOSED ORDER. ATTORNEY COATES WILL PROVIDE DEFENDANT'S MOBILE PHONE TO ATTORNEY LOPEZ BY WEDNESDAY (4/08/2020). JUDGE GRANTED MR. COATES A 14 DAY REVIEW PERIOD OFF ALL DOCUMENTS BEFORE HANDING TO ATTORNEY LOPEZ.
04/02/2020	<b>Proposed Order</b> PROPOSED ORDER ON MOTION TO COMPEL ANSWERS TO INTERROGATORIES AND MOTION TO COMPEL RESPONSES TO REQUESTS FOR PRODUCTION FROM DEFENDANT SCOTT MICHAEL FRENCH HEARD ON FEBRUARY 19, 2020 (RECEIVED, SENT TO OCURT COORDINATOR)
04/03/2020	<b>Notice Of Filing</b> NOTICE OF FILING RULE 11 AGREEMENT. FILED BY ATTORNEY GEORGINA BUCKLEY
04/03/2020	<b>Notice Of Filing</b> NOTICE OF FILING RULE 11 AGREEMENT.
04/06/2020	<b>Certificate Of Deposition</b> RULE 203 CERTIFICATION RE: BLUE CROSS SHIELD OF TEXAS - INSURANCE
04/07/2020	<b>Proposed Order</b>

AMENDED ORDER ON DEFENDANT SCOTT MICHAEL FRENCH'S MOTION FOR PROTECTIVE ORDER. (RECEIVED, EMAILED TO COURT COORDINATOR) FILED BY ATTORNEY ROBERT VALADEZ

04/07/2020 **Certificate Of Deposition**  
RULE 203 CERTIFICATION. RECORDS PERTAINING TO: MIGUEL ANGEL CABELLO. \$244.24 CHARGED TO DEFENDANT

04/07/2020 **Certificate Of Deposition**  
RULE 203 CERTIFICATION. RECORDS PERTAINING TO: ROSARIO CAMARILLO-CABELLO \$245.89 CHARGED TO DEFENDANT

04/08/2020 **Certificate Of Deposition**  
RULE 203 CERTIFICATION. RECORDS PERTAINING TO ROSARIO CAMARILLO CABELLO. RE: LAREDO SPORTS MEDICINE CLINIC- BILLING

04/08/2020 **Certificate Of Deposition**  
RULE 203 CERTIFICATION. RECORDS PERTAINING TO:ROSARIO CAMARILLO-CABELLO. RE: ORTHOPEDIC PHYSICAL THERAPY- BILLING

04/08/2020 **Certificate Of Deposition**  
RULE 203 CERTIFICATION. RECORDS PERTAINING TO: MIGUAL ANGEL CABELLO. RE: LAREDO SPORTS MEDICINE CLINIC - MEDICAL

04/08/2020 **Certificate Of Deposition**  
RULE 203 CERTIFICATION. RECORDS PERTAINING TO: MIGUAL ANGEL CABELLO. RE: LAREDO SPORTS MEDICINE- BILLING

04/08/2020 **Order-Miscellaneous**  
AMENDED ORDER ON DEFENDANT SCOTT MICHAEL FRENCH'S MOTION FOR PROTECTIVE ORDER. GRANTED IN PART AND DENIED IN PART. SIGNED ON 4/8/2020 BY JUDGE BECKIE PALOMO.

04/08/2020 **Order-Miscellaneous**  
ORDER ON MOTION TO COMPEL ANSWERS TO INTERROGATORIES AND MOTION TO COMPEL RESPONSES TO REQUESTS FOR PRODUCTION FROM DEFENDANT SCOTT MICHAEL FRENCH HEARD ON FEBRUARY 19, 2020. SIGNED ON 4/8/2020 BY JUDGE BECKIE PALOMO.

04/08/2020 **Order-Miscellaneous**  
LEVEL 3 DISCOVERY- CONTROL PLAN. SIGNED ON 4/8/2020 BY JUDGE BECKIE PALOMO

04/14/2020 **Certificate Of Deposition**  
RULE 203 CERTIFICATION RECORDS PERTAINING TO ROSARIO CAMARILLO-CABELLO FROM LAREDO SPORTS MEDICAL RADIOLOGY \$222.20 PAID BY ATTORNEY LARRY D. WARREN

04/14/2020 **Certificate Of Deposition**  
RULE 203 CERTIFICATION PERTAINING TO MIGUEL ANGEL CABELLO FROM LAREDO SPORTS MEDICINE CLINIC RADIOLOGY \$222.20 PAID BY ATTORNEY LARRY D. WARREN

04/14/2020 **Certificate Of Deposition**  
RULE 203 CERTIFICATION RECORDS PERTAINING TO ROSARIO CAMARILLO-CABELLO FROM ORTHOPEDIC PHYSICAL THERAPY- MEDICAL \$315.80 PAID BY ATTORNEY LARRY D. WARREN

04/14/2020 **Certificate Of Deposition**  
RULE 203 CERTIFICATION. RECORDS PERTAINING TO OMAR HERRERA VALDIVIA RE: AADAM Z. QURAISHI, M.D.-BILLING

04/14/2020 **Proposed Order**  
PROPOSED AMENDED LEVEL 3 DISCOVERY-CONTROL PLAN. RECEIVED, EMAILED TO COURT COORDINATOR

04/14/2020 **Certificate Of Discovery**  
CERTIFICATE OF WRITTEN DISCOVERY

04/14/2020 **Notice Of Deposition**  
NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS RE: LAREDO POLICE DEPARTMENT (RECORDS)

04/16/2020 **Certificate Of Deposition**  
RULE 203 CERTIFICATION. RECORDS PERTAINING TO ROSARIO CAMARILLO-CABELLO RE: LAREDO SPORTS MEDICINE CLINIC- MEDICAL (\$307.00 CHARGED TO DEFENDANT)

04/16/2020 **Notice Of Filing**  
NOTICE OF FILING RULE 11 AGREEMENT

04/17/2020 **Notice of Intent**  
NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS RE: LAREDO MEDICAL CENTER (RADIOLOGY)

04/17/2020 **Notice of Intent**  
NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS RE: LAREDO MEDICAL CENTER (MEDICAL)

04/17/2020 **Order-Miscellaneous**  
AMENDED LEVEL 3 DISCOVERY-CONTROL PLAN. SIGNED ON 4/16/2020 BY JUDGE BECKIE PALOMO

04/20/2020 **Certificate Of Discovery**  
CERTIFICATE OF WRITTEN DISCOVERY FILED BY RODERICK LOPEZ

04/21/2020 **Certificate Of Discovery**  
CERTIFICATE OF WRITTEN DISCOVERY

04/22/2020 **Certificate Of Deposition**  
RULE 203 CERTIFICATION PERTAINING TO ROSARIO CAMARILLO-CABELLO RE: LAREDO MEDICAL CENTER- RADIOLOGY

04/23/2020 **Certificate Of Deposition**  
RULE 203 CERTIFICATION RECORDS PERTAINING TO: ROSARIO CAMARILLO-CABELLO RE: LAREDO MEDICAL CENTER- MEDICAL \$656.67 CHARGED TO DEFENDANT

04/30/2020 **Notice of Intent**  
NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS RE: DR. GREG PURSLEY, THE PC WELLNESS CENTERS (MEDICAL)

05/04/2020 **Motion To Quash**  
DEFENDANT'S MOTION TO QUASH THE VIDEO/ORAL DEPOSITION OF LUIS ANTONIO VILLANUEVA

05/05/2020 **Notice of Intent**  
AMENDED NOTICE OF INTENT TO TAKE THE ORAL DEPOSITION OF LUIS ANTONIO VILLANUEVA

05/05/2020 **Certificate Of Deposition**  
RULE 203 CERTIFICATION RECORDS PERTAINING TO: ROSARIO CAMARILLO-CABELLO \$212.10 CHARGED TO DEFENDANT

05/07/2020 **Notice of Intent**  
NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS RE: CITY OF LAREDO FIRE DEPARTMENT/EMS (EMS)

05/14/2020 **Notice of Intent**  
NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS RE: LAREDO POLICE DEPARTMENT (ANY & ALL RECORDS)

05/15/2020 **Notice of Removal**  
NOTICE OF FILING TO REMOVE CAUSE TO UNITED STATES DISTRICT COURT, SOUTHERN DISTRICT OF TEXAS - LAREDO DIVISION

06/02/2020 **Certificate Of Deposition**  
RULE 203 CERTIFICATION RE: TEXAS DEPARTMENT OF PUBLIC SAFETY- LICENSE RECORDS SERVICE- DRIVING RECORDS (\$357.34 CHARGED TO DEFENDANT)

06/11/2020 **Certificate Of Deposition**  
REPORTER'S CERTIFICATION DEPOSITION OF ROSARIO CAMARILLO-CABELLO TAKEN ON APRIL 17, 2020 (REPORTED REMOTELY)

06/11/2020 **Certificate Of Deposition**  
REPORTER'S CERTIFICATION DEPOSITION OF MIGUEL ANGEL CABELLO TAKEN ON APRIL 17, 2020 (REPORTED REMOTELY)



06/11/2020 **Certificate Of Deposition**  
REPORTER'S CERTIFICATION DEPOSITION OF JESUS TAPIA, III TAKEN ON APRIL 15, 2020

06/11/2020 **Certificate Of Deposition**  
RECORDS PERTAINING TO: ROSARIO CAMARRILLO CABELLO RE: LAREDO MEDICAL CENTER- MEDICAL

06/11/2020 **Certificate Of Deposition**  
RECORDS PERTAINING TO: ROSARIO CAMARRILLO CABELLO RE: CITY OF LAREDO- PAYROLL

06/25/2020 **Notice Of Delivery**  
NOTICE OF DELIVERY RE: AT&T (PHONE RECORDS)

06/25/2020 **Notice Of Delivery**  
NOTICE OF DELIVERY RE: LAREDO POLICE DEPARTMENT (DISPATCH RECORDS AND/OR CALL SHEETS)

06/25/2020 **Notice Of Delivery**  
NOTICE OF DELIVERY RE: LAREDO POLICE DEPARTMENT (ANY & ALL RECORDS)

08/10/2020 **Notice Of Delivery**  
NOTICE OF DELIVERY. RE: LAREDO MEDICAL CENTER (MEDICAL) \$311.33 CHARGED TO DEFENDANT

08/25/2020 **Notice Of Delivery**  
NOTICE OF DELIVERY RE: CITY OF LAREDO FIRE DEPARTMENT/EMS (EMS)

09/28/2020 **Notice Of Delivery**  
NOTICE OF DELIVERY RE: DR. GREG PURSLEY, THE PC WELLNESS CENTERS (MEDICAL)

10/07/2020 **Notice Of Delivery**  
NOTICE OF DELIVERY RE: LAREDO POLICE DEPARTMENT (RECORDS)

10/26/2020 **CANCELED Final Pre-Trial** (9:00 AM) (Judicial Officer Palomo, Beckie)  
Cancelled

11/16/2020 **CANCELED Jury Trial** (9:00 AM) ()  
Cancelled

01/25/2021 **Notice Of Delivery**  
NOTICE OF DELIVERY RE: LAREDO POLICE DEPARTMENT (ANY & ALL RECORDS)

03/29/2021 **Letter**  
LETTER FROM UNITED STATES DISTRICT COURT - SOUTHERN DISTRICT OF TEXAS. ENCLOSING A CERTIFIED COPY OF AN ORDER REMANDING THE CASE TO OUR COURT.

03/30/2021 **Motion-Miscellaneous**  
MOTION TO SCHEDULE A TRIAL DATE AND TO ENTER A PRETRIAL GUIDELIN ORDER AND LEVEL 3 DISCOVERY CONTROL PLAN

03/30/2021 **Proposed Order**  
NOTICE OF HEARING (MOTION TO SCHEDULE A TRIAL DATE AND TO ENTER A PRETRIAL GUIDELINE ORDER AND LEVEL 3 DISCOVERY CONTROL PLAN)- RECEIVED, SENT TO COURT COORDINATOR

03/31/2021 **Notice Of Hearing**  
NOTICE OF HEARING (MOTION TO SCHEDULE A TRIAL DATE AND TO ENTER A PRETRIAL GUIDELINE ORDER AND LEVEL THREE CONTROL PLAN) SET FOR 04/07/21 AT 9 AM. SIGNED BY JUDGE PALOMO ON 03/31/21. COURT STAFF EMAILED COPIES TO : FILINGS@RLOPEZPC.COM LWARREN@NAMANHOWELL.COM GBUCKLEY@NAMANHOWELL.COM RVALADEZ@SHELTON-VALADEZ.COM FIRM@GDLFIRM.COM EFILINGS@COWENLAW.COM ADOLFO RAMOS

04/21/2021 **Docket Control Conference** (9:00 AM) (Judicial Officer Palomo, Beckie)  
Motion to schedule a trial date and to enter a pretrial guideline order and level 3 discovery control plan filed by Jesus Tapia, III, Individually As Wrongful Death Beneficiary and Representative of the Estate of Jesus Tapia, Jr.

04/21/2021 **Notes-Hearing Notes**  
CASE CALLED VIA ZOOM. HONORABLE JUDGE BECKIE PALOMO PRESIDING. COURT REPORTER ANA ALCANTAR. DOCKET CONTROL CONFERENCE HEARING HELD. ATTORNEY URIEL DRUKER PRESENT FOR ROSARIO CAMARILLO-CABELLO. ATTORNEY GOERGINA BURKELY PRESENT. ATTORNEY MELISSA CASSEY PRESENT FOR BUCHHEIT TRUCKING SERVICE INC. ATTORNEY MICHAEL TUTTLE PRESENT FOR OMAR HERRERA VALDIVIA. ATTORNEY RODERICK C. LOPEZ PRESENT FOR THE ESTATE OF JESUS TAPIA JR. ATTORNEYS WERE GIVEN DATES FOR TRIAL. FINAL PRE-TRIAL SET FOR 11/29/24 AT 9:00 A.M. JURY TRIAL SET FOR 12/13/21 AT 8:00 A.M. PRE-TRIAL GUIDLINE ORDER WILL BE SUBMITTED BY ATTORNEY RODERICK LOPEZ AND ALSO WILL BE SUBMITTING MOTION TO COMPEL WITH FIAT.

06/08/2021 **Certificate Of Discovery**  
CERTIFICATE OF WRITTEN DISCOVERY. FILED BY ATTORNEY RODERICK CARLOS LOPEZ

06/18/2021 **Notice of Intent**  
NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS

06/23/2021 **Motion For Entry**  
MOTION FOR ENTRY OF LEVEL 3 DISCOVERY- CONTROL PLAN

06/23/2021 **Proposed Order**  
PROPOSED NOTICE OF HEARING RECEIVED/SENT TO COURT COORDINATOR.

06/24/2021 **Certificate Of Deposition**  
REPORTER'S CERTIFICATE VIDEOTAPED DEPOSITION OF LUIS ANTONIO VILLANUEVA

06/25/2021 **Certificate-Miscellaneous**  
CERTIFICATE OF WRITTEN DISCOVERY RE: SECOND SET OF REQUEST FOR PRODUCTION TO DEFENDANT BUCHHEIT TRUCKING SERVICE INC.

06/29/2021 **Letter**  
LETTER FROM ATTORNEY FROM RODERICK C. LOPEZ- VACATION DATES

06/30/2021 **Notice Of Hearing**  
NOTICE OF HEARING (MOTION FOR ENTRY OF LEVEL THREE DISCOVERY CONTROL PLAN SET ON 7/21/21 AT 9:00 A.M.) SIGNED BY JUDGE BECKIE PALOMO ON 6/29/21. EMAILED ATTORNEYS ADOLFO RAMOS, RODERICK C. LOPEZ, LARRY D. WARREN, GEORGINA E. BUCKLEY, ROBERT A. VALADEZ, MELISSA CASEY AND MICHAEL TUTTLE BY COURT COORDINATOR.

07/02/2021 **Notice of Intent**  
NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS

07/08/2021 **Objections**  
PLAINTIFF ROSARIO CAMRILLO-CABELLO'S OBJECTIONS, MOTION TO QUASH AND MOTION FOR PROTECTIVE ORDER REGARDING MEDICAL RECORDS. ATTACHED WITH ORDER SETTING HEARING (RECEIVED, SENT TO COURT COORDINATOR)

07/09/2021 **Order Setting Hearing**  
ORDER SETTING HEARING ON PLAINTIFF ROSARIO CAMARILLO-CABELLO'S MOTION TO QUASH AND MOTION FOR PROTECTIVE ORDER REGARDING MEDICAL RECORDS SET ON 07/21/21 AT 9 AM. SIGNED BY JUDGE BECKIE PALOMO ON 7/8/21. STAFF COURT E-MAILED COPIES TO ATTORNEYS: URIEL DRUKER, LARRY D. WARREN, RODERICK C. LOPEZ, ROBERT A. VALADEZ, MICHAEL TUTTLE, GBUCKLEY@NAMANHOWELL.COM, DCOATES@SHELTON-VALADEZ.COM, EFILINGS@COWENLAW.COM, MCASEY@SHELTON-VALADEZ.COM AND ADOLFO RAMOS.

07/12/2021 **Notice of Intent**  
NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS OF CUSTODIAN OF RECORDS FOR: LAREDO POLICE DEPARTMENT (RECORDS)

07/14/2021 **Certificate Of Discovery**

**CERTIFICATE OF WRITTEN DISCOVERY**

07/20/2021 **Notice of Intent**  
NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS

07/21/2021 **Motion To Compel**  
CROSS CLAIMANT'S MOTION TO COMPEL DATES FOR ORAL DEPOSITIONS

07/21/2021 **Proposed Order**  
PROPOSED NOTICE OF HEARING (MOTION TO COMPEL). RECEIVED/SENT TO COURT COORDINATOR

07/21/2021 **Proposed Order**  
PROPOSED ORDER ON CROSS CLAIMANT'S MOTION TO COMPEL DATES FOR ORAL DEPOSITIONS. RECEIVED/SENT TO COURT COORDINATOR

07/21/2021 **Notice of Intent**  
NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS RE: STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY C/O CORPORATION SERVICE COMPANY (INSURANCE)

07/21/2021 **Notice of Intent**  
NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS RE: CAPE GIRARDEAU POLICE DEPARTMENT (ACCIDENT)

07/22/2021 **Notice Of Hearing**  
NOTICE OF HEARING (MOTION TO COMPEL DATES FOR ORAL DEPOSITIONS) SET ON 7/27/21 AT 9:00 A.M. SIGNED BY JUDGE BECKIE PALOMO ON 7/21/21. COURT STAFF E-MAILED COPIES TO ATTORNEYS: FILINGS@RLOPEZPC.COM LWARREN@NAMANHOWELL.COM GBUCKLEY@NAMANHOWELL.COM RVALADEZ@SHELTON-VALADEZ.COM DCOATES@SHELTON-VALADEZ.COM FIRM@GDLFIRM.COM EFILINGS@COWENLAW.COM MICHAELT@COWENLAW.COM MCASEY@SHELTON-VALADEZ.COM ADOLFO RAMOS

07/23/2021 **Certificate Of Discovery**  
CERTIFICATE OF WRITTEN DISCOVERY

07/23/2021 **Certificate Of Discovery**  
CERTIFICATE OF WRITTEN DISCOVERY FILED BY RODERICK LOPEZ

07/26/2021 **Objections**  
PLAINTIFF ROSARIO CAMARILLO-CABELLO'S OBJECTIONS AND MOTION FOR PROTECTIVE ORDER REGARDING MEDICAL RECORDS. ATTACHED WITH ORDER SETTING HEARING (RECEIVED, SENT TO COURT COORDINATOR)

07/27/2021 **Docket Control Conference** (9:00 AM) (Judicial Officer Palomo, Beckie)  
1) Plaintiff's Motion for Enter of level 3 discovery control plan 2) PLAINTIFF ROSARIO CAMARILLO-CABELLO'S OBJECTIONS, MOTION TO QUASH AND MOTION FOR PROTECTIVE ORDER REGARDING MEDICAL RECORDS 3) Plaintiff Motion to Compel Dates for Oral Depositions  
07/21/2021 Reset by Court to 07/27/2021

07/27/2021 **Response**  
DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION TO QUASH AND FOR PROTECTIVE ORDER

07/27/2021 **Proposed Order**  
PROPOSED ORDER ON PLAINTIFF'S ROSARIO CAMARILLO-CABELLO OBJECTIONS, MOTION TO QUASH AND MOTION FOR PROTECTIVE ORDER REGARDING RECORDS. RECEIVED/SENT TO COURT COORDINATOR.

07/27/2021 **Miscellaneous Filing**  
PLAINTIFFS SUPPLEMENTAL TO OBJECTIONS, MOTION TO QUASH AND MOTION FOR PROTECTIVE ORDER REGARDING MEDICAL RECORDS

07/27/2021 **Notes-Hearing Notes**  
CASE CALLED VIA ZOOM. HONORABLE JUDGE BECKIE PALOMO PRESIDING. COURT REPORTER: YVONNE NINO. HEARING HELD ON:  
1) PLAINTIFF'S MOTION FOR ENTER OF LEVEL 3 DISCOVERY CONTROL PLAN 2) PLAINTIFF ROSARIO CAMARILLO-CABELLO'S OBJECTIONS, MOTION TO QUASH AND MOTION FOR PROTECTIVE ORDER REGARDING MEDICAL RECORDS 3) PLAINTIFF'S MOTION TO COMPEL DATES FOR ORAL DEPOSITIONS. ATTORNEY URIEL DRUCKER PRESENT FOR PLAINTIFF. ATTORNEYS MELISSA CASEY AND GEORGINA BUCKLEY GRAHAM PRESENT FOR BUCHHEIT TRUCKING SERVICE INC. ATTORNEY RODERICK LOPES PRESENT FOR THE ESTATE OF JESUS TAPIA JR. ATTORNEY LOPEZ URGED MOTION TO COMPEL DATES FOR ORAL DEPOSITIONS. ATTORNEY GRAHAM-BUCKLEY OBJECTED TO THE MOTION SINCE SHE DID NOT RECEIVE THE 3 DAYS PROPER CONFERENCE NOTICE AND THERE WERE NEW WITNESSES ADDED. ATTORNEY LOPEZ REQUESTED AN OPPORTUNITY TO AMEND MOTION TO COMPEL AND GET NEW HEARING DATE. MOTION TO COMPEL RESET TO 08/12/21 AT 9 AM. ATTORNEY LOPEZ URGED MOTION FOR DISCOVERY CONTROL PLAN. ATTORNEY BUCKLEY AND CASSEY GAVE MR LOPEZ TO SIGN ORDER ON THEIR BEHALF. ATTORNEY DRUKER URGED MOTION FOR PROTECTIVE ORDER. ARGUMENTS HERAD FROM ATTORNEYS DRUKER AND BUCKLEY GRAHAM. JUDGE DEFERRED RULING TO REVIEW RULE 11 AGREEMENT ON FILE AND CASE LAW. ATTORNEYS ARE TO SUBMIT PROPOSED ORDERS.

07/28/2021 **Proposed Order**  
PROPOSED ORDER ON PLAINTIFFS OBJECTIONS, MOTION TO QUASH AND MOTION FOR PROTECTIVE ORDER REGARDING MEDICAL RECORDS (RECEIVED, SENT TO COURT COORDINATOR)

07/29/2021 **Notice of Intent**  
NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS (AT & T PHONE RECORDS) FILED BY CYNTHIA TENIENTE

08/02/2021 **Notice of Intent**  
NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS FILED BY US LEGAL SUPPORT RECORDS DEPARTMENT

08/02/2021 **Proposed Order**  
PROPOSED AGREED LEVEL 3 DISCOVERY-CONTROL PLAN (RECEIVED, SENT TO COURT COORDINATOR)

08/02/2021 **Notice-Miscellaneous**  
EMAIL FROM COURT COORDINATOR RE: PLAINTIFF'S MOTION TO COMPEL HEARING SET ON 8/12/21 AT 9:00 A.M. COURT COORDINATOR E-MAILED COPIES TO: FILINGS@RLOPEZPC.COM LWARREN@NAMANHOWELL.COM GBUCKLEY@NAMANHOWELL.COM RVALADEZ@SHELTON-VALADEZ.COM DCOATES@SHELTON-VALADEZ.COM FIRM@GDLFIRM.COM EFILINGS@COWENLAW.COM MICHAELT@COWENLAW.COM MCASEY@SHELTON-VALADEZ.COM ADOLFO@RLOPEZPC.COM BIANCA@COWENLAW.COM

08/02/2021 **Order-Miscellaneous**  
ORDER ON PLAINTIFFS OBJECTIONS, MOTION TO QUASH AND MOTION FOR PROTECTIVE ORDER REGARDING MEDICAL RECORDS SIGNED BY JUDGE PALOMO ON 08/02/21. COPIES MAILED TO ATTORNEYS URIEL DRUKER, LARRY WARREN, ROBERT VALADEZ, AND MIHCAEL TUTLE

08/03/2021 **Proposed Order**  
PROPOSED NOTICE OF HEARING (MOTION TO COMPEL AND MOTION FOR PROTECTIVE ORDER)- RECEIVED, SENT TO COURT COORDINATOR

08/03/2021 **Response**  
DEFENDANT BUCHHEIT TRUCKING SERVICE, INC'S RESPONSE TO PLAINTIFF'S MOTION TO COMPEL THE DEPOSITION OF JEFF BUCHEIT AND MOTION FOR PROTECTIVE ORDER

08/04/2021 **Motion To Compel**  
CROSS CLAIMANT'S AMENDED MOTION TO COMPEL DATES FOR ORAL DEPOSITIONS

08/04/2021 **Proposed Order**  
PROPOSED NOTICE OF HEARING RECEIVED/SENT TO COURT COORDINATOR.

08/04/2021 **Notice Of Hearing**

NOTICE OF HEARING (MOTION TO COMPEL) SET FOR 8/12/21 AT 9:00 A.M. SIGNED BY JUDGE BECKIE PALOMO ON 8/3/21. COURT STAFF E-MAILED COPIES TO ATTORNEYS: FILINGS@RLOPEZPC.COM LWARREN@NAMANHOWELL.COM GBUCKLEY@NAMANHOWELL.COM RVALADEZ@SHELTON-VALADEZ.COM DCOATES@SHELTON-VALADEZ.COM FIRM#GDLFIRM.COM EFILINGS@COWENLAW.COM MCASEY@SHELTON-VALADEZ.COM ADOLFO RAMOS

08/04/2021 **Order-Miscellaneous**  
 AGREED LEVEL 3 DISCOVERY-CONTROL PLAN (FINAL PRE-TRIAL SET ON 4/11/22 AT 9:00 A.M. AND TRIAL IS SET ON 4/25/22 AT 8:00 A.M.) SIGNED BY JUDGE BECKIE PALOMO ON 8/3/21. COURT STAFF E-MAILED COPIES TO ATTORNEYS: FILINGS@RLOPEZPC.COM LWARREN@NAMANHOWELL.COM GBUCKLEY@NAMANHOWELL.COM RVALADEZ@SHELTON-VALADEZ.COM DCOATES@SHELTON-VALADEZ.COM FIRM@GLFIRM.COM EFILINGS@OWENLAW.COM MICHAELT@COWENLAW.COM MCASEY@SHELTON-VALADEZ.COM ADOLFO@RLOPEZPC.COM

08/04/2021 **Notice Of Hearing**  
 NOTICE OF HEARING (AMENDED MOTION TO COMPEL) SET ON 8/12/21 AT 9:00 A.M. SIGNED BY JUDGE BECKIE PALOMO ON 8/4/21. COURT STAFF E-MAILED COPIES TO ATTORNEYS: FILINGS@RLOPEZPC.COM LWARREN@NAMANHOWELL.COM GBUCKLEY@NAMANHOWELL.COM RVALADEZ@SHELTON-VALADEZ.COM DCOATES@SHELTON-VALADEZ.COM FIRM@GDLFIRM.COM EFILINGS@COWENLAW.COM MICHAELT@COWENLAW.COM MCASEY@SHELTON-VALADEZ.COM ADOLFO RAMOS

08/06/2021 **Certificate Of Discovery**  
 CERTIFICATE OF WRITTEN DISCOVERY FILED BY RODERICK C LOPEZ

08/09/2021 **Motion To Compel**  
 DEFENDANT'S MOTION TO COMPEL PLAINTIFF'S RESPONSES TO DEFENDANT'S FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION

08/09/2021 **Proposed Order**  
 PROPOSED NOTICE OF HEARING (DEFENDANT'S FIRST SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION)- RECEIVED, SENT TO COURT COORDINATOR

08/09/2021 **Notice Of Hearing**  
 NOTICE OF HEARING (MOTION TO COMPEL) SET ON 08/12/21 AT 9 AM. SIGNED BY JUDGE PALOMO ON 08/09/21. COURT STAFF EMAILED COPIES TO: FILINGS@RLOPEZPC.COM LWARREN@NAMANHOWELL.COM GBUCKLEY@NAMANHOWELL.COM RVALADEZ@SHELTON-VALADEZ.COM DCOATES@SHELTON-VALADEZ.COM FIRM@GDLFIRM.COM EFILINGS@COWENLAW.COM MICHAELT@COWENLAW.COM MCASEY@SHELTON-VALADEZ.COM ADOLFO RAMOS

08/12/2021 **Motion Hearing** (9:00 AM) (Judicial Officer Palomo, Beckie)  
 1) Amended Motion to Compel Dates for Oral Depositions 2) Defendant Buchheit Trucking Service, Inc s Response to Plaintiffs Motion to Compel The Deposition of Jeff Buchheit and Motion For Protective Order

08/12/2021 **Notes-Hearing Notes**  
 CASE CALLED VIA ZOOM. HONORABLE JUDGE BECKIE PALOMO PRESIDING. COURT REPORTER: ANA ALCANTAR. HEARING TYPE: 1) AMENDED MOTION TO COMPEL DATES FOR ORAL DEPOSITIONS 2) DEFENDANT BUCHHEIT TRUCKING SERVICE, INC S RESPONSE TO PLAINTIFFS MOTION TO COMPEL THE DEPOSITION OF JEFF BUCHHEIT AND MOTION FOR PROTECTIVE ORDER. ATTORNEY DRUKER URIEL PRESENT FOR PLAINTIFF. ATTORNEY MELISSA CASEY AND GEORGINA BUCKLEY-GRAHAM PRESENT FOR BUCHHEIT TURCKING SERVICE INC. ATTORNEY RODERICK LOPEZ PRESENT FOR ESTATE OF JESUS TAPIA JR. ATTORNEY LOPEZ ANNOUNCED THE MOTION TO COMPEL DATES FOR DEPOSITIONS WAS RESOLVED AND THEY HAD AN AGREEMENT. MAT MILLER'S DEPOSITION IS SET ON 10/14/21 AT 1 PM. BRAD REDDEN'S DEPOSITION IS SET ON 10/13/21 AT 1 PM. THE CORPORATE'S REPRESENTATIVE DEPOSITION IS SET ON 10/15/21 AT 9 AM. MS. OLLER IS NO LONGER AN EMPLOYEE, BUT ATTORNEY BUCKLEY GRAHAM WILL GIVE ATTORNEY LOPEZ HER LAST KNOWN ADDRESS. ATTORNEYS ARE TO SEND BUCKLEY GRAHAM FORMAL NOTICE. JUDGE GRANTED REQUEST FOR ATTORNEY BUCKLEY TO PROVIDE NAMES OF CORPORATE REPRESENTATIVE AFTER SHE RECEIVES NOTICE. ATTORNEY CASSEY WILL PRODUCE FAITH FRENCH AND LORETTA FAITH FOR DEPOSITION ON 10/12/21. NO SUBPOENA OR LETTERS ROGATORY NEEDED. ATTORNEY DRUKER ANNOUNCED HIM AND ATTORNEY BUCKLEY GRAHAM MIGHT AGREEMENT VIA EMAIL IN REGARDS TO DEPOSITION OF MEDICAL PROVIDERS. ATTORNEYS WILL SUBMIT RULE 11 AGREEMENT. IF THEY DO NOT REACH AGREEMENT, ATTORNEY DRUKER CAN FILE FIAT. ATTORNEY BUCKLEY-GRAHAM URGED MOTION TO COMPEL MEDICAL RECORDS AND BILLINGS. ATTORNEY DRUKER IS TO PRODUCE SUPPLEMENTAL REQUEST FOR PRODUCTION AND DISCLOSURES IN 7 DAYS.

08/13/2021 **Certificate Of Discovery**  
 CERTIFICATE OF WRITTEN DISCOVERY

08/20/2021 **Notice-Miscellaneous**  
 NOTICE OF DESIGNATION OF LEAD COUNSEL

08/23/2021 **Certificate Of Discovery**  
 CERTIFICATE OF WRITTEN DISCOVERY RE: BUCHHEIT TRUCKING SERVICE

08/24/2021 **Amended Petition**  
 PLAINTIFFS' AMENDED PETITION AND REQUEST FOR DISCLOSURE \*FEE FOR CITATION PAID\*

08/24/2021 **Citation-Issuance**  
 (2) CITATION ISSUED AS TO BUCHHEIT LOGISTICS INC. PLACED IN PRIVATE SERVER'S BASKET

08/24/2021 **Citation**  
 BUCHHEIT LOGISTICS, INC. Unserved

08/30/2021 **Notice of Intent**  
 NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS RE: LARRY D. WARREN AND GEORGINA E. BUCKLEY (NAMAN, HOWELL, SMITH & LEE, PLLC) AND ROBERT A. VALADEZ AND MELISSA CASEY (SHELTON & VALADEZ, P.C.)

09/03/2021 **Notice of Intent**  
 SECOND AMENDED NOTICE OF INTENTION TO TAKE DEPOSITIONS BY WRITTEN QUESTIONS

09/03/2021 **Notice of Intent**  
 NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS

09/09/2021 **Notice of Intent**  
 NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS

09/10/2021 **Cross Claim**  
 ORIGINAL ANSWER AND AMENDED CROSS-CLAIM/INTERVENTION

09/13/2021 **Citation-Issuance**  
 (2) CITATIONS ISSUED AS TO BUCHHEIT LOGISTICS INC. PLACED IN PRIVATE SERVER'S BASKET

09/13/2021 **Citation-Issuance**  
 (2) CITATIONS ISSUED AS TO MATT MILLER. PLACED IN PRIVATE SERVER'S BASKET

09/13/2021 **Citation**  
 BUCHHEIT LOGISTICS, INC. Served 09/21/2021  
 Returned 09/24/2021

09/13/2021 **Citation**  
 MILLER, MATT Served 09/21/2021  
 Returned 09/24/2021

09/17/2021 **Notice Of Filing**  
 DEFENDANT, BUCHHEIT TRUCKING SERVICE, INC'S, NOTICE OF FILING COUNTER-AFFIDAVITS OF THOMAS STEVENS, CPC, CCS-P, CMIS, CMOM

09/17/2021 **Notice Of Filing**



DEFENDANT, BUCHHEIT TRUCKING SERVICE, INC'S, NOTICE OF FILING COUNTER-AFFIDAVITS OF THOMAS STEVENS, CPC, CCS-P, CMIS, CMOM

09/22/2021 **Motion To Compel**  
MOTION TO COMPEL DISCOVERY

09/22/2021 **Proposed Order**  
PROPOSED NOTICE OF HEARING (MOTION TO COMPEL). RECEIVED/SENT TO COURT COORDINATOR

09/24/2021 **Citation Return-Executed**  
CITATION RETURNED EXECUTED AS TO BUCHHEIT LOGISITCS. DATE OF SERVICE 09/21/21

09/24/2021 **Citation Return-Executed**  
CITATION RETURNED EXECUTED AS TO MATT MILLER. DATE OF SERVICE 09/21/21

09/24/2021 **Notice Of Hearing**  
NOTICE OF HEARING (MOTION TO COMPEL SET ON 10/06/21 AT 9:00 AM) SIGNED BY JUDGE PALOMO ON 09/23/21. COURT STAFF EMAILED COPIES TO: FILINGS@RLOPEZPC.COM LWARREN@NAMANHOWELL.COM GBUCKLEY@NAMANHOWELL.COM RVALADEZ@SHELTON-VALADEZ.COM DCOATES@SHELTON-VALADEZ.COM FIRM@GDLFIRM.COM EFILINGS@COWENLAW.COM MICHAELT@COWENLAW.COM MCASEY@SHELTON-VALADEZ.COM ADOLFO RAMOS

09/30/2021 **Motion To Compel**  
PLAINTIFFS' EMERGENCY MOTION TO COMPEL DEPOSITIONS

09/30/2021 **Proposed Order**  
PROPOSED ORDER SETTING HEARING ON PLAINTIFFS' EMERGENCY MOTION TO COMPEL DEPOSITIONS . RECEIVED/SET TO COURT COORDINATOR

10/01/2021 **Order Setting Hearing**  
ORDER SETTING HEARING ON PLAINTIFF'S EMERGENCY MOTION TO COMPEL DEPOSITIONS SET FOR 10/6/21 AT 9:00 A.M. SIGNED BY JUDGE BECKIE PALOMO ON 9/30/21. COURT STAFF EMAILED COPIES TO: FILINGS@RLOPEZPC.COM LWARREN@NAMANHOWELL.COM GBUCKLEY@NAMANHOWELL.COM RVALADEZ@SHELTON-VALADEZ.COM DCOATES@SHELTON-VALADEZ.COM FIRM@GDLFIRM.COM EFILINGS@COWENLAW.COM MICHAELT@COWENLAW.COM MCASEY@SHELTON-VALADEZ.COM ADOLFO@RLOPEZPC.COM

10/01/2021 **Motion-Miscellaneous**  
MOTION TO CHALLENGE OBJECTIONS AND MOTION COMPEL DISCOVERY FROM DEFENDANT SCOTT MICHAEL FRENCH

10/01/2021 **Proposed Order**  
PROPOSED ORDER (NOTICE OF HEARING MOTION TO CHALLENGE OBJECTION AND MOTION TO COMPEL DISCOVERY FROM DEFENDANT SCOTT MICHAEL FRENCH) RECEIVED/SENT TO COURT COORDINATOR.

10/01/2021 **Proposed Order**  
PROPOSED ORDER (MOTION TO CHALLENGE OBJECTION AND MOTION TO COMPEL DISCOVERY FROM DEFENDANT SCOTT MICHAEL FRENCH). RECEIVED/SENT TO COURT COORDINATOR

10/01/2021 **Motion To Compel**  
CROSS-CLAIMANT'S EMERGENCY MOTION TO COMPEL IN-PESRON DEPOSITIONS

10/01/2021 **Proposed Order**  
PROPOSED ORDER ON CROSS CLAIMANT'S EMERGENCY MOTION TO COMPEL IN-PERSON DEPOSITION. RECEIVED/SENT TO COURT COORDINATOR

10/01/2021 **Proposed Order**  
PROPOSED NOTICE OF HEARING (CROSS CLAIMANT'S EMERGENCY MOTION TO COMPEL IN-PERSON DEPOSITIONS) RECEIVED/SENT TO COURT COORDINATOR.

10/01/2021 **Motion-Miscellaneous**  
MOTION TO CHALLENGE OBJECTIONS AND MOTION COMPEL DISCOVERY FROM DEFENDANT BUCHHETT TRUCKING SERVICE, INC.

10/01/2021 **Proposed Order**  
PROPOSED ORDER ( MOTION FOR COMPEL) RECEIVED/SENT TO COURT COORDINATOR.

10/01/2021 **Proposed Order**  
PROPOSED ORDER (MOTION TO CHALLENGE OBJECTIONS AND MOTION TO COMPEL DISCOVERY) RECEIVED/SENT TO COURT COORDINATOR.

10/01/2021 **Motion-Miscellaneous**  
MOTION TO CHALLENGE OBJECTIONS AND MOTION COMPEL DISCOVERY FROM DEFENDANT BUCHHEIT TRUCKING SERVICE, INC. (SECOND SET FO REQUEST FOR PRODUCTION)

10/01/2021 **Proposed Order**  
PROPOSED ORDER (NOTICE OF HEARING MOTION TO CHALLENGE OBJECTIONS AND MOTION COMPEL DISCOVERY FROM DEFENDANT BUCHHEIT TRUCKING SERVICE, INC. (SECOND SET FO REQUEST FOR PRODUCTION)). RECEIVED/SENT TO COURT COORDINATOR

10/01/2021 **Proposed Order**  
PROPOSED ORDER (PROPOSED ORDER (MOTION TO CHALLENGE OBJECTIONS AND MOTION COMPEL DISCOVERY FROM DEFENDANT BUCHHEIT TRUCKING SERVICE, INC. (SECOND SET FO REQUEST FOR PRODUCTION)). RECEIVED/SENT TO COURT COORDINATOR

10/04/2021 **Notice Of Hearing**  
NOTICE OF HEARING (CROSS CLAIMANT'S EMERGENCY MOTION TO COMPEL IN-PERSON DEPOSITIONS) SET FOR 10/6/21 AT 9:00 A.M. SIGNED BY JUDGE BECKIE PALOMO ON 10/1/21. COURT STAFF E-MAILED COPIES TO: FILINGS@RLOPEZPC.COM LWARREN@NAMANHOWELL.COM GBUCKLEY@NAMANHOWELL.COM RVALADEZ@SHELTON-VALADEZ.COM DCOATES@SHELTON-VALADEZ.COM FIRM@GDLFIRM.COM EFILINGS@COWENLAW.COM MICHAELT@COWENLAW.COM MCASEY@SHELTON-VALADEZ.COM ADOLFO RAMOS SANDRA GARIBAY

10/04/2021 **Order Setting Hearing**  
ORDER (MOTION TO CHALLENGE OBJECTIONS AND MOTION TO COMPEL DISCOVERY) SET FOR 10/6/21 AT 9:00 A.M. SIGNED BY JUDGE BECKIE PALOMO ON 10/1/21. COURT STAFF E-MAILED COPIES TO: FILINGS@RLOPEZPC.COM LWARREN@NAMANHOWELL.COM GBUCKLEY@NAMANHOWELL.COM RVALADEZ@SHELTON-VALADEZ.COM DCOATES@SHELTON-VALADEZ.COM FIRM@GDLFIRM.COM EFILINGS@COWENLAW.COM MICHAELT@COWENLAW.COM MCASEY@SHELTON-VALADEZ.COM ADOLFO RAMOS SANDRA GARIBAY

10/04/2021 **Order Setting Hearing**  
ORDER (MOTION TO CHALLENGE OBJECTIONS AND MOTION TO COMPEL DISCOVERY)(SECOND SET FOR REQUEST FOR PRODUCTION) SET FOR 10/6/21 AT 9:00 A.M. SIGNED BY JUDGE BECKIE PALOMO ON 10/1/21. COURT STAFF E-MAILED COPIES TO: FILINGS@RLOPEZPC.COM LWARREN@NAMANHOWELL.COM GBUCKLEY@NAMANHOWELL.COM RVALADEZ@SHELTON-VALADEZ.COM DCOATES@SHELTON-VALADEZ.COM FIRM@GDLFIRM.COM EFILINGS@COWENLAW.COM MICHAELT@COWENLAW.COM MCASEY@SHELTON-VALADEZ.COM ADOLFO RAMOS SANDRA GARIBAY

10/04/2021 **Order Setting Hearing**  
ORDER (MOTION TO CHALLENGE OBJECTIONS AND MOTION TO COMPEL DISCOVERY FROM DEFENDANT SCOTT MICHAEL FRENCH) SET FOR 10/6/21 AT 9:00 A.M. SIGNED BY JUDGE BECKIE PALOMO. COURT STAFF E-MAILED COPIES TO: FILINGS@RLOPEZPC.COM LWARREN@NAMANHOWELL.COM GBUCKLEY@NAMANHOWELL.COM RVALADEZ@SHELTON-VALADEZ.COM DCOATES@SHELTON-VALADEZ.COM FIRM@GDLFIRM.COM EFILINGS@COWENLAW.COM MICHAELT@COWENLAW.COM MCASEY@SHELTON-VALADEZ.COM ADOLFO RAMOS SANDRA GARIBAY

10/05/2021 **Letter**  
LETTER FROM ATTORNEY FROM NAMAN HOWELL SMITH & LEE RE: RESE HEARING

10/05/2021 **Advisement To The Court**  
ADVISORY TO THE COURT AND SUPPLEMENTAL TO CERTIFICATE OF CONFERENCE

10/06/2021 **Motion Hearing** (9:00 AM) (Judicial Officer Palomo, Beckie)  
1) Motion to Compel filed by Cross-Claimant Jesus Tapia, III, individually and as wrongful death beneficiary and representative of the Estate of Jesus Tapia, Jr 2) PLAINTIFFS EMERGENCY MOTION TO COMPEL DEPOSITIONS 3) CROSS CLAIMANT'S EMERGENCY MOTION TO COMPEL IN-PERSON DEPOSITIONS 4) MOTION TO CHALLENGE OBJECTIONS AND MOTION COMPEL DISCOVERY FROM DEFENDANT SCOTT MICHAEL FRENCH 5) MOTION TO CHALLENGE OBJECTIONS AND MOTION COMPEL DISCOVERY FROM DEFENDANT BUCHHEIT TRUCKING SERVICE, INC. 6) MOTION TO CHALLENGE OBJECTIONS AND MOTION COMPEL DISCOVERY FROM DEFENDANT BUCHHEIT TRUCKING SERVICE, INC. (SECOND SET OF REQUESTS FOR PRODUCTION)

10/06/2021 **Response**  
DEFENDANT BUCHHEIT TRUCKING SERVICE, INC.'S RESPONSE TO PLAINTIFFS' MOTION TO COMPEL; ATTACHED EXHIBIT A-E

10/06/2021 **Notice of Intent**  
FIRST AMENDED NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS

10/06/2021 **Notes-Hearing Notes**  
CASE CALLED VIA ZOOM. HONORABLE JUDGE BECKIE PALOMO PRESIDING. COURT REPORTER: YVONNE NINO. HEARING TYPE: (1) MOTION TO COMPEL, (2) PLAINTIFFS EMERGENCY MOTION TO COMPEL DEPOSITIONS, (3) CROSS CLAIMANT'S EMERGENCY MOTION TO COMPEL IN-PERSON DEPOSITIONS, (4) MOTION TO CHALLENGE OBJECTIONS AND MOTION COMPEL DISCOVERY FROM DEFENDANT SCOTT MICHAEL (5) MOTION TO CHALLENGE OBJECTIONS AND MOTION TO COMPEL DEFENDANT BUCHHEIT TRUCKING SERVICES, AND (6) MOTION TO CHALLENGE OBJECTIONS AND MOTION TO COMPEL DISCOVERY FROM DEFENDANT BUCHHEIT TRUCKING SERVICE, INC. (SECOND SET OF REQUESTS FOR PRODUCTION). ATTORNEY URIEL DRUKER PRESENT FOR PLAINTIFF. ATTORNEY EVAN PATTERSON PRESENT FOR BUCHHEIT TRUCKING SERVICE INC. ATTORNEY RODERICK C LOPEZ PRESENT FOR THE ESTATE OF JESUS TAPIA JR. ATTORNEY WAYNE COLODNY PRESENT FOR MICHAEL SCOTT FRENCH. ATTORNEYS LOPEZ AND COLODNY ANNOUNCED THEY HAD AGREED TO RESET MOTION TO CHALLENGE. MOTION TO CHALLENGE OBJECTIONS AND COMPEL DISCOVERY FROM SCOTT MICHAEL FRENCH RESET TO 11/01/2021 AT 9 AM. ATTORNEY LOPEZ URGED MOTION TO COMPEL. ARGUMENTS HEARD FROM ATTORNEYS LOPEZ AND COLODNY. MOTION TO COMPEL GRANTED. ATTORNEYS ARE FILE MOTION TO PRODUCE HIPAA. ATTORNEYS LOPEZ AND DRUKER URGED EMERGENCY MOTIONS TO COMPEL DEPOSITIONS. ARGUMENTS HEARD FROM ATTORNEYS. MOTIONS GRANTED. ALL DEPOSITIONS ARE TO TAKE PLACE IN PERSON, WITH THE EXCEPTION OF MR. FRENCH'S MOTHER, WHOM WILL DO IT VIRTUALLY VIA ZOOM. MR LOPEZ REQUESTED FOR ROOM TO BE SCANNED, COMMUNICATION DEVICES TURNED OFF, AND FOR NO OTHER PARTIES OR WITNESSES TO BE NEAR HER DURING DEPOSITION. REQUEST GRANTED. ATTORNEYS ARE TO SUBMIT NEW PROPOSED ORDER. ATTORNEY PATTERSON URGED MOTION FOR CONTINUANCE ON MOTION TO CHALLENGE OBJECTIONS AND MOTION TO COMPEL. MOTION DENIED. LOPEZ URGED MOTION TO CHALLENGE OBJECTIONS AND MOTION TO COMPEL DISCOVERY FROM DEFENDANT BUCHHEIT TRUCKING SERVICE INC. ARGUMENTS HEARD FROM ATTORNEY PATTERSON AND LOPEZ ON REQUESTS FOR PRODUCTIONS. RULING ON RECORD. HEARING TO BE CONTINUED ON 10/06/2021 AT 4 PM.

10/06/2021 **Notes-Hearing Notes**  
CASE CALLED VIA ZOOM. HONORABLE JUDGE BECKIE PALOMO PRESIDING. COURT REPORTER: YVONNE NINO. HEARING CONTINUED ON MOTION TO CHALLENGE OBJECTIONS AND MOTION TO COMPEL DEFENDANT BUCHHEIT TRUCKING SERVICES AND MOTION TO CHALLENGE OBJECTIONS AND MOTION TO COMPEL DISCOVERY FROM DEFENDANT BUCHHEIT TRUCKING SERVICE, INC. (SECOND SET OF REQUESTS FOR PRODUCTION). ATTORNEY URIEL DRUKER PRESENT FOR PLAINTIFF. ATTORNEY GEORGINA BUCKLEY-GRAHAM PRESENT FOR BUCHHEIT TRUCKING SERVICE INC. ATTORNEY RODERICK C LOPEZ PRESENT FOR THE ESTATE OF JESUS TAPIA JR. ATTORNEY LOPEZ CONTINUED URGING MOTION TO CHALLENGE OBJECTIONS AND MOTION TO COMPEL DISCOVERY FROM DEFENDANT BUCHHEIT TRUCKING SERVICE INC. ARGUMENTS HEARD FROM ATTORNEY BUCKLEY AND LOPEZ ON REQUESTS FOR PRODUCTIONS. RULING ON RECORD. HEARING TO BE CONTINUED ON 10/07/2021 AT 9 PM.

10/07/2021 **Motion Hearing** (10:00 AM) (Judicial Officer Palomo, Beckie)

10/07/2021 **Motion To Compel**  
MOTION TO COMPEL DEFENDANT BUCHHEIT TRUCKING SERVICE, INC. TO DISCLOSE SETTLEMENT AGREEMENTS

10/07/2021 **Proposed Order**  
PROPOSED ORDER (MOTION TO COMPEL DEFENDANT BUCHHEIT TRUCKING SERVICE, INC. TO DISCLOSE SETTLEMENT AGREEMENTS). RECEIVED.

10/07/2021 **Proposed Order**  
PROPOSED NOTICE OF HEARING (MOTION TO COMPEL DEFENDANT BUCHHEIT TRUCKING SERVICE, INC. TO DISCLOSE SETTLEMENT AGREEMENTS). RECEIVED AND SENT TO COURT COORDINATOR.

10/07/2021 **Order-Miscellaneous**  
ORDER ON CROSS-CLAIMANT'S EMERGENCY MOTION TO COMPEL IN PERSON DEPOSITIONS SIGNED BY JUDGE BECKIE PALOMO ON 10/7/2021. ORDER EMAILED BY COURT COORDINATOR AS TO ATTORNEY URIEL DRUKER/ ATTORNEY RODERICK LOPEZ/ ATTORNEY LARRY WARREN/ ATTORNEY MICHAEL TUTTLE/ ATTORNEY ROBERT VALADEZ

10/07/2021 **Order-Miscellaneous**  
ORDER ON MOTION TO COMPEL SIGNED BY JUDGE BECKIE PALOMO ON 10/7/2021. ORDER EMAILED BY COURT COORDINATOR AS TO ATTORNEY LARRY WARREN/ ATTORNEY URIEL DRUKER/ ATTORNEY MICHAEL TUTTLE/ ATTORNEY ROBERT VALADEZ

10/07/2021 **Notice Of Delivery**  
NOTICE OF DELIVERY RE: STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY C/O CORPORATION SERVICE COMPANY (INSURANCE)

10/07/2021 **Notice-Miscellaneous**  
(5) CERTIFIED COPIES OF ORDER ON MOTION TO COMPEL MAILED AS TO ATTORNEY URIEL DRUKER/ ATTORNEY ROBERT VALADEZ/ ATTORNEY MICHAEL TUTTLE/ ATTORNEY RODERICK LOPEZ/ ATTORNEY LARRY WARREN

10/07/2021 **Notice-Miscellaneous**  
(5) CERTIFIED COPIES OF ORDER ON CROSS CLAIMANT'S EMERGENCY MOTION TO COMPEL IN PERSON DEPOSITIONS MAILED AS TO ATTORNEY URIEL DRUKER/ ATTORNEY ROBERT VALADEZ/ ATTORNEY MICHAEL TUTTLE/ ATTORNEY RODERICK LOPEZ/ ATTORNEY LARRY WARREN

10/07/2021 **Motion To Compel**  
MOTION TO COMPEL DEFENDANT SCOTT MICHAEL SCOTT FRENCH TO PRODUCE EXECUTED HIPAA RELEASE AUTHORIZATIONS

10/07/2021 **Proposed Order**  
PROPOSED NOTICE OF HEARING (RECEIVED, SENT TO COURT COORDINATOR)

10/07/2021 **Certificate Of Discovery**  
CERTIFICATE OF WRITTEN DISCOVERY

10/07/2021 **Notes-Hearing Notes**  
CASE CALLED VIA ZOOM. HONORABLE JUDGE BECKIE PALOMO PRESIDING. COURT REPORTER: YVONNE NINO. HEARING CONTINUED ON MOTION TO CHALLENGE OBJECTIONS AND MOTION TO COMPEL DEFENDANT BUCHHEIT TRUCKING SERVICES AND MOTION TO CHALLENGE OBJECTIONS AND MOTION TO COMPEL DISCOVERY FROM DEFENDANT BUCHHEIT TRUCKING SERVICE, INC. (SECOND SET OF REQUESTS FOR PRODUCTION). ATTORNEY URIEL DRUKER PRESENT FOR PLAINTIFF. ATTORNEY GEORGINA BUCKLEY-GRAHAM PRESENT FOR BUCHHEIT TRUCKING SERVICE INC. ATTORNEY RODERICK C LOPEZ PRESENT FOR THE ESTATE OF JESUS TAPIA JR. ATTORNEY WAYNE COLODNY PRESENT FOR MICHAEL SCOTT FRENCH. ATTORNEY LOPEZ CONTINUED URGING



MOTION TO CHALLENGE OBJECTIONS AND MOTION TO COMPEL DISCOVERY FROM DEFENDANT BUCHEIT TRUCKING SERVICE INC. ARGUMENTS HEARD FROM ATTORNEY BUCKLEY AND LOPEZ ON REQUESTS FOR PRODUCTIONS. RULING ON RECORD. ATTORNEY BUCKLEY IS TO PRODUCE ALL POSSIBLE DOCUMENTS BY Friday AT 1:30 PM. ALL OTHER DOCUMENTS ARE DUE BY Saturday AT 5:00PM.

10/08/2021 **Certificate Of Discovery**  
CERTIFICATE OF WRITTEN DISCOVERY

10/08/2021 **Certificate Of Discovery**  
CERTIFICATE OF WRITTEN OF DISCOVERY

10/08/2021 **Notice Of Hearing**  
NOTICE OF HEARING (MOTION TO COMPEL BUCHEIT TRUCKING SERVICE, INC. TO DISCLOSE SETTLEMENT AGREEMENTS) SET FOR 10/18/21 AT 9:00 A.M. SIGNED BY JUDGE BECKIE PALOMO ON 10/7/21. COURT STAFF E-MAILED COPIES TO: FILINGS@RLOPEZPC.COM LWARREN@NAMANHOWELL.COM GBUCKLEY@NAMANHOWELL.COM RVALADEZ@SHELTON-VALADEZ.COM DCOATES@SHELTON-VALADEZ.COM FIRM@GDLFIRM.COM EFILINGS@COWENLAW.COM MCASEY@SHELTON-VALADEZ.COM ADOLFO RAMOS SANDRA GARIBAY

10/11/2021 **Certificate Of Discovery**  
CERTIFICATE OF WRITTEN DISCOVERY

10/11/2021 **Miscellaneous Filing**  
SPECIAL APPEARANCE OF DEFENDANTS MATT MILLER AND BUCHEIT LOGISTICS INC.

10/13/2021 **Notice Of Hearing**  
NOTICE OF HEARING (MOTION TO COMPEL SET ON 11/01/21 AT 9 AM) SIGNED BY JUDGE BECKIE PALOMO ON 10/12/21. COURT STAFF EMAILED COPIES TO: FILINGS@RLOPEZPC.COM LWARREN@NAMANHOWELL.COM GBUCKLEY@NAMANHOWELL.COM RVALADEZ@SHELTON-VALADEZ.COM FIRM@GDLFIRM.COM EFILINGS@COWENLAW.COM MCASEY@SHELTON-VALADEZ.COM ADOLFO RAMOS SANDRA GARIBAY

10/14/2021 **Notice of Intent**  
AMENDED NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS RE: SOUTHEAST HEALTH (ANY & ALL RECORDS)

10/15/2021 **Letter**  
LETTER RE: CANCEL HEARING FOR 10/18/21. FILED BY ATTORNEY RODERICK LOPEZ

10/18/2021 **CANCELED Motion Hearing** (9:00 AM) (Judicial Officer Palomo, Beckie)  
Cancelled  
*Motion to Compel Buchheit Trucking Service, Inc. to disclose settlement agreement(s) filed by Cross-Claimant Jesus*

10/27/2021 **Notice Of Delivery**  
NOTICE OF DELIVERY RE: LAREDO POLICE DEPARTMENT (RECORDS)

10/29/2021 **Notice of Intent**  
NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS

11/01/2021 **Motion Hearing** (9:00 AM) (Judicial Officer Palomo, Beckie)  
1) MOTION TO CHALLENGE OBJECTIONS AND MOTION COMPEL DISCOVERY FROM DEFENDANT SCOTT MICHAEL FRENCH 2) Motion to compel Defendant Scott Michael French to Produce Executed HIPAA Release Authorizations (for two providers), filed by Cross-Claimant

11/01/2021 **Notes-Hearing Notes**  
CASE CALLED VIA ZOOM. HONORABLE JUDGE BECKIE PALOMO PRESIDING. COURT REPORTER: BLANCA HILL. HEARING TYPE: 1) MOTION TO CHALLENGE OBJECTIONS AND MOTION TO COMPEL DISCOVERY FROM DEFENDANT SCOTT MICHAEL FRENCH; AND 2) MOTION TO COMPEL DEFENDANT SCOTT MICHAEL FRENCH TO PRODUCE EXECUTED HIPAA RELEASE AUTHORIZATIONS. ATTORNEY RODERICK LOPEZ PRESENT FOR THE ESTATE OF JESUS TAPIA JR. NO ONE ELSE PRESENT. ATTORNEY ANNOUNCED THEY WERE TRYING TO WORK ON AN AGREEMENT AND REQUESTED TO PASS THE HEARING TO THE NEXT AVAILABLE DATE. CASE RESET TO 11/17/21 AT 9 AM.

11/03/2021 **Notice-Miscellaneous**  
RULE 203 CERTIFICATION RE: ROSARIO CAMARILLO- CABELLO (CITY OF LAREDO FIRE DEPARTMENT - MEDICAL)

11/03/2021 **Certificate-Miscellaneous**  
RULE 203 CERTIFICATION RE : ROSARIO CAMARILLO-CABELLO (CITY OF LAREDO FIRE DEPARTMENT- BILLING)

11/03/2021 **Notice of Intent**  
AMENDED NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS RE: KBR, INC. DBA KELLOGG BROWN & ROOT (KBR), INC.

11/05/2021 **Certificate Of Discovery**  
CERTIFICATE OF WRITTEN DISCOVERY

11/09/2021 **Notice of Intent**  
NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS RE: LYFT, INC. C/O CT CORPORATION SYSTEM (PERSONNEL AND PAYROLL)

11/16/2021 **Notice Of Filing**  
NOTICE OF FILING RULE 11 AGREEMENT. WITH RULE 11 AGREEMENT

11/17/2021 **CANCELED Motion Hearing** (9:00 AM) (Judicial Officer Judge, Visiting)  
Cancelled  
1) MOTION TO CHALLENGE OBJECTIONS AND MOTION COMPEL DISCOVERY FROM DEFENDANT SCOTT MICHAEL FRENCH

11/17/2021 **Notes-Hearing Notes**  
ZOOM CONFERENCE. JUDGE SUSAN REED PRESIDING. BLANCA HILL, COURT REPORTER. HEARING: MOTION. COUNSEL/PARTIES NOT PRESENT. CASE DROPPED.

11/29/2021 **CANCELED Final Pre-Trial** (9:00 AM) (Judicial Officer Palomo, Beckie)  
Cancelled

12/02/2021 **Notice Of Delivery**  
NOTICE OF DELIVERY RE: KBR, INC. DBA KELLOG BROWN & ROOT (KBR), INC. C/O CORPORATION SYSTEM (ANY & ALL RECORDS)

12/13/2021 **CANCELED Jury Trial** (8:00 AM) (Judicial Officer Palomo, Beckie)  
Cancelled

12/20/2021 **Notice-Miscellaneous**  
RULE 203 CERTIFICATION RE: LAREDO SPORTS MEDICINE CLINIC (RADIOLOGY).

12/27/2021 **Certificate Of Discovery**  
CERTIFICATE OF WRITTEN DISCOVERY FILED BY ATTORNEY RODERICK LOPEZ.

01/03/2022 **Designation Of Expert Witness**  
DESIGNATION OF TESTIFYING EXPERT WITNESSES BY JESUS TAPIA, III, INDIVIDUALLY AND AS WRONGFUL DEATH BENECIARY AND REPRESENTATIVE OF THE ESTATE OF JESUS TAPIA, JR. (DEFENDANT/CROSS PLAINTIFFS/INTERVENOR)

01/06/2022 **Motion To Compel**  
CROSS-CLAIMANT'S MOTION TO COMPEL MEDIATION

01/06/2022 **Proposed Order**  
PROPOSED NOTICE OF HEARING (MOTION TO COMPEL MEDIATION). RECEIVED/SENT TO COURT COORDINATOR

01/06/2022 **Motion To Compel**  
CROSS CLAIMANT'S MOTION TO COMPEL THE ORAL DEPOSITION OF JEFF BUCHEIT (EXHIBITS ATTACHED)

01/06/2022 **Proposed Order**

PROPOSED NOTICE OF HEARING (MOTION TO COMPEL THE ORAL DEPOSITION OF JEFF BUCHEIT). RECEIVED/SENT TO COURT COORDINATOR.

01/11/2022 **Notice Of Hearing**  
NOTICE OF HEARING (MOTION TO COMPEL ORAL DEPOSITION) SET ON 01/31/22 AT 9 AM. SIGNED BY JUDGE PALOMO ON 01/10/22. COURT STAFF EMAILED COPIES TO: FILINGS@RLOPEZPC.COM LWARREN@NAMANHOWELL.COM GBUCKLEY@NAMANHOWELL.COM RVALADEZ@SHELTON-VALADEZ.COM DCOATES@SHELTON-VALADEZ.COM FIRM@GDLFIRM.COM EFILINGS@COWENLAW.COM MCASEY@SHELTON-VALADEZ.COM ADOLFO RAMOS SANDRA GARIBAY

01/11/2022 **Motion-Miscellaneous**  
DEFENDANTS MOTION TO COMPEL DISCOVERY FROM JESUS TAPIA III AS REPRESENTATIVE OF THE ESTATE OF JESUS TAPIA JR.

01/11/2022 **Motion-Miscellaneous**  
DEFENDANTS MOTION TO COMPEL DISCOVERY FROM ROSARIO CAMARILLO-CABELLO AND HER MINOR SON AND ORDER IN CAMERA INSPECTION AND RELEASE OF PRIVILEGE LOG MATERIALS

01/11/2022 **Proposed Order**  
NOTICE OF HEARING. ORDER SENT TO COURT COORDINATOR FOR FURTHER PROCESS

01/11/2022 **Motion To Exclude**  
DEFENDANT BUCHHEIT TRUCKING SERVICE, INC'S MOTION TO EXTEND EXPERT DEADLINES AND COMPEL AND/OR STRIKE PLAINTIFFS AND INTERVENORS EXPERT. ATTACHED WITH PROPOSED ORDER \*NO FIAT\*

01/11/2022 **Notice of Intent**  
NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS RE: DENISE LONGORIA, PHD; AND DR. OSCAR PEREZ

01/12/2022 **Notice Of Hearing**  
NOTICE OF HEARING(MOTION TO COMPEL MEDIATION FILED BY CROSS-CLAIMANT JESUS TAPIA, III) SET FOR 1/31/22 AT 9:00 A.M. SIGNED BY JUDGE BECKIE PALOMO ON 1/10/22. COURT STAFF EMAILED COPIES TO: FILINGS@RLOPEZPC.COM LWARREN@NAMANHOWELL.COM GBUCKLEY@NAMANHOWELL.COM RVALADEZ@SHELTON-VALADEZ.COM DCOATES@SHELTON-VALADEZ.COM FIRM@GDLFIRM.COM EFILINGS@COWENLAW.COM MCASEY@SHELTON-VALADEZ.COM ADOLFO RAMOS SANDRA GARIBAY

01/12/2022 **Notice Of Hearing**  
NOTICE OF HEARING(DEFENDANTS' MOTION TO EXTEND EXPERT DEADLINES AND COMPEL AND/OR STRIKE PLAINTIFFS AND INTERVENORS EXPERTS) SET FOR 1/31/22 AT 9:00 A.M. SIGNED BY JUDGE BECKIE PALOMO ON 1/12/22. COURT STAFF EMAILED COPIES TO: FILINGS@RLOPEZPC.COM LWARREN@NAMANHOWELL.COM GBUCKLEY@NAMANHOWELL.COM RVALADEZ@SHELTON-VALADEZ.COM DCOATES@SHELTON-VALADEZ.COM FIRM@GDLFIRM.COM EFILINGS@COWENLAW.COM MCASEY@SHELTON-VALADEZ.COM ADOLFO RAMOS SANDRA GARIBAY

01/17/2022 **Certificate Of Deposition**  
RULE 203 CERTIFICATION RE: DYNAMIC PAIN MANAGEMENT- MEDICAL

01/19/2022 **Notice of Intent**  
NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS RE: VARIOUS PROVIDERS

01/24/2022 **Certificate Of Deposition**  
RULE 203 CERTIFICATION RE: PREMIER SPINE INJURY PHYSICIANS (BILLING R &N)

01/24/2022 **Certificate Of Deposition**  
RULE 203 CERTIFICATION RE: LAREDO MEDICAL CENTER (MEDICAL)

01/25/2022 **Notice of Intent**  
NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS RE: ESSENTIA INSURANCE COMPANY (INSURANCE)

01/25/2022 **Motion To Extend Time**  
PLAINTIFFS CABELLO MOTION TO EXTEND TIME AND ALTERNATIVELY FOR CONTINUANCE (ORDER SETTING HEARING ATTACHED).. RECEIVED/SENT TO COURT COORDINATOR.

01/25/2022 **Motion To Compel**  
PLAINTIFFS CABELLO JOINDER IN CROSS-PLAINTIFFS MOTION TO COMPEL THE ORAL DEPOSITION OF JEFF BUCHHEIT AND MOTION FOR DISCOVERY OF NET WORTH FOR EXEMPLARY DAMAGES CLAIM WITH ATTACHED ORDER SETTING HEARING AND EXHIBITS 1-2. NO ORDER FILED.

01/26/2022 **Order Setting Hearing**  
ORDER SETTING HEARING (PLAINTIFFS CABELLO JOINDER IN CROSS-CLAIMANTS MOTION TO COMPEL THE ORAL DEPOSITION OF JEFF BUCHHEIT AND MOTION FOR DISCOVERY OF NET WORTH FOR EXEMPLARY DAMAGES CLAIM) SET FOR 1/31/22 AT 9:00 A.M. SIGNED BY JUDGE BECKIE PALOMO ON 1/25/22. COURT STAFF EMAILED COPIES TO: FILINGS@RLOPEZPC.COM LWARREN@NAMANHOWELL.COM GBUCKLEY@NAMANHOWELL.COM RVALADEZ@SHELTON-VALADEZ.COM FIRM@GDLFIRM.COM EFILINGS@COWENLAW.COM MCASEY@SHELTON-VALADEZ.COM ADOLFO RAMOS SANDRA GARIBAY MEGAN OCHOA

01/26/2022 **Order Setting Hearing**  
ORDER SETTING HEARING (PLAINTIFFS CABELLO MOTION TO EXTEND TIME AND ALTERNATIVELY FOR CONTINUANCE) SET FOR 1/31/22 AT 9:00 A.M. SIGNED BY JUDGE BECKIE PALOMO ON 1/25/22. COURT STAFF EMAILED COPIES TO: FILINGS@RLOPEZPC.COM LWARREN@NAMANHOWELL.COM GBUCKLEY@NAMANHOWELL.COM RVALADEZ@SHELTON-VALADEZ.COM FIRM@GDLFIRM.COM EFILINGS@COWENLAW.COM MCASEY@SHELTON-VALADEZ.COM ADOLFO RAMOS SANDRA GARIBAY MEGAN OCHOA

01/26/2022 **Notice of Intent**  
NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS RE: RIO HEALTH PHARMACY (PHARMACY)

01/26/2022 **Notice of Intent**  
NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS

01/26/2022 **Motion To Compel**  
CROSS-PLAINTIFF/INTERVENOR'S MOTION TO COMPEL VERIFICATION FROM DEFENDANT BUCHHEIT TRUCKING SERVICE, INC.

01/26/2022 **Proposed Order**  
PROPOSED NOTICE OF HEARING (MOTION TO COMPEL VERIFICATION) - RECEIVED, SENT TO COURT COORDINATOR

01/26/2022 **Motion To Compel**  
CROSS-PLAINTIFF/INTERVENOR'S MOTION TO COMPEL PRODUCTION OF LONE STAR FORENSIC GROUP'S CELL PHONE DATA FROM DEFENDANT SCOTT MICHAEL FRENCH

01/26/2022 **Proposed Order**  
PROPOSED NOTICE OF HEARING (MOTION TO COMPEL) - RECEIVED, SENT TO COURT COORDINATOR

01/26/2022 **Proposed Order**  
ORDER (MOTION TO COMPEL PRODUCTION OF LONE STAR FORENSIC GROUP'S CELL PHONE DATA FROM SCOTT MICHAEL FRENCH). ORDER SENT TO COURT COORDINATOR

01/26/2022 **Proposed Order**  
PROPOSED ORDER (MOTION TO COMPEL) RECEIVED/SENT TO COURT COORDINATOR

01/26/2022 **Motion For Discovery**  
MOTION FOR DISCOVERY OF NET WORTH EVIDENCE FOR EXEMPLARY DAMAGES CLAIM (RECEIVED, SENT TO COURT COORDINATOR)

01/26/2022 **Proposed Order**  
PROPOSED NOTICE OF HEARING (MOTION FOR DISCOVERY) - RECEIVED, SENT TO COURT COORDINATOR

01/26/2022 **Proposed Order**  
PROPOSED ORDER (MOTION FOR DISCOVERY OF NET WORTH EVIDENCE FOR EXEMPLARY DAMAGES CLAIM)

01/27/2022 **Notice Of Hearing**  
NOTICE OF HEARING (MOTION TO COMPEL VERIFICATION) SET FOR 01/31/22 AT 9 AM. SIGNED BY JUDGE PALOMO ON 01/26/22. COURT STAFF EMAILED COPIES TO: FILINGS@RLOPEZPC.COM LWARREN@NAMANHOWELL.COM GBUCKLEY@NAMANHOWELL.COM RVALADEZ@SHELTON-VALADEZ.COM FIRM@GDLFIRM.COM EFILINGS@COWENLAW.COM MCASEY@SHELTON-VALADEZ.COM ADOLFO RAMOS SANDRA GARIBAY MEGAN OCHOA

01/27/2022 **Notice Of Hearing**  
NOTICE OF HEARING (MOTION FOR DISCOVERY OF NET WORTH EVIDENCE FOR EXEMPLARY DAMAGES CLAIMS) SET FOR 01/31/22 AT 9 AM. SIGNED BY JUDGE PALOMO ON 01/26/22. COURT STAFF EMAILED COPIES TO: FILINGS@RLOPEZPC.COM LWARREN@NAMANHOWELL.COM GBUCKLEY@NAMANHOWELL.COM RVALADEZ@SHELTON-VALADEZ.COM FIRM@GDLFIRM.COM EFILINGS@COWENLAW.COM MCASEY@SHELTON-VALADEZ.COM ADOLFO RAMOS SANDRA GARIBAY MEGAN OCHOA

01/27/2022 **Notice Of Hearing**  
NOTICE OF HEARING (MOTION TO COMPEL PRODUCTION) SET FOR 01/31/22 AT 9 AM. SIGNED BY JUDGE PALOMO ON 01/26/22. COURT STAFF EMAILED COPIES TO: FILINGS@RLOPEZPC.COM LWARREN@NAMANHOWELL.COM GBUCKLEY@NAMANHOWELL.COM RVALADEZ@SHELTON-VALADEZ.COM FIRM@GDLFIRM.COM EFILINGS@COWENLAW.COM MCASEY@SHELTON-VALADEZ.COM ADOLFO RAMOS SANDRA GARIBAY MEGAN OCHOA

01/28/2022 **Proposed Order**  
ORDER GRANTING MOTION TO COMPEL DISCOVERY OF NET WORTH EVIDENCE FOR EXEMPLARY DAMAGES CLAIM/ORDER SENT TO COURT COORDINATOR

01/31/2022 **Motion Hearing** (9:00 AM) (Judicial Officer Palomo, Beckie)  
1) Motion to Compel the oral deposition of Jeff Buchheit filed by Cross-Claimant Jesus 2) Motion to Compel mediation filed by Cross-Claimant Jesus Tapia, III, 3) The Defendants Motion to Extend Expert Deadlines and Compel and/or Strike Plaintiffs and Intervenors Experts, Defendants Motion to Compel Discovery From Jesus Tapia III as Representative of the Estate of Jesus Tapia Jr., and Defendants Motion to Compel Discovery From Rosario Camarillo-Cabello and Her Minor Son and Order in Camera Inspection and Release of Privilege Log Materials 4) Plaintiffs Cabello Joinder in Cross-Claimants Motion to Compel the Oral Deposition of Jeff Buchheit and Motion for Discovery of Net Worth for Exemplary Damages Claim 5) Plaintiffs Cabello Motion to Extend Time and Alternatively for Continuance

04/11/2022 **Final Pre-Trial** (9:00 AM) (Judicial Officer Palomo, Beckie)

04/25/2022 **Jury Trial** (8:00 AM) (Judicial Officer Palomo, Beckie)  
4-5 DAYS